




CITY OF
Boca Raton

CITY HALL
201 WEST PALMETTO PARK ROAD • BOCA RATON, FL 33432
PHONE: (561) 393-7700
(FOR HEARING IMPAIRED) TDD: (561) 367-7043
www.myboca.us

MEMORANDUM

TO: Mayor and City Council
FROM: Diana Grub Frieser
City Attorney 
DATE: August 17, 2017
SUBJECT: Prohibition of Conversion Therapy on Minors

At the request of the Mayor and Council Members, we reviewed the Model Conversion Therapy Ban Ordinance ("Model Ordinance") proposed by the Palm Beach County Human Rights Council ("PBCHRC") and provide the following information/analysis.

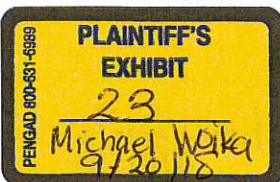
Conversion therapy (also known by various other names, such as treatment for "unwanted same-sex attraction") is the practice of attempting to change a person's sexual orientation through psychological counseling. The PBCHRC and the Model Ordinance rely on, and cite to, numerous scientific articles and studies that conclude conversion therapy and other "sexual orientation change efforts" ("SOCE") are ineffective, erroneously presume that homosexuality and gender nonconformity are mental diseases or defects, and may, in fact, cause psychological harm, particularly to children.¹

The Model Ordinance is aimed at protecting minors from being exposed to conversion therapy. It contains a blanket prohibition on the practice of conversion therapy on minors by state-licensed professionals (physicians, psychotherapists, etc.).² A proposed ordinance would only apply to minors, meaning adults are free to seek out such therapy if they so choose. It would not apply to "clergy or other religious leaders who are acting in their roles as clergy or pastoral counselors, or are providing religious instruction to congregants," so long as they do not "hold themselves out as operating pursuant to" a state-issued license.

¹ Should the Council choose to proceed with an ordinance, copies of the following materials, referenced by the PBCHRC in the Model Ordinance, will be on file with the City Clerk for inclusion in the record:

- <http://pediatrics.aappublications.org/content/pediatrics/92/4/631.full.pdf>
- https://www.camft.org/ias/images/PDFs/SOCE/APA_Position_Statement.pdf
- <https://www.apa.org/pi/lgbt/resources/therapeutic-response.pdf>
- <http://www.apa.org/about/policy/sexual-orientation.pdf>
- <http://www.apsa.org/content/2012-position-statement-attempts-change-sexual-orientation-gender-identity-or-gender>
- [http://www.jaacap.com/article/S0890-8567\(12\)00500-X/pdf](http://www.jaacap.com/article/S0890-8567(12)00500-X/pdf)
- http://www.paho.org/hq/index.php?option=com_content&view=article&id=6803%3A2012-therapies-change-sexual-orientation-lack-medical-justification-threaten-health&catid=740%3Apress-releases&Itemid=1926&lang=en
- https://www.schoolcounselor.org/asca/media/asca/PositionStatements/PS_LGBTQ.pdf
- <http://store.samhsa.gov/shin/content/SMA15-4928/SMA15-4928.pdf>
- <http://annals.org/article.aspx?articleid=2292051>

² In California, a state law subjecting licensed mental health professionals to professional discipline by the state for engaging in SOCE was upheld by a federal appellate court against a challenge on several grounds, including that it violated the therapist's First Amendment rights and the fundamental rights of parents to make decisions regarding the care, custody, and control of their children. See *Pickup v. Brown*, 740 F.3d 1208 (9th Cir. 2014).



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PLAINTIFFS' EXHIBIT 23

It is worth noting that although regulation of health professions occurs through licensure at the state level, there is no express statutory preemption regarding the state's regulation of licensed health professions (nor any case law finding an implied preemption).³ However, given the extensive regulation of health professions by the state, it is possible a court may, in the future, find the regulatory field has been impliedly preempted to the state (thereby prohibiting local regulation).

The PBCHRC advises that the Model Ordinance has, thus far, been adopted by a number of municipalities throughout Florida, including, in Palm Beach County, the cities of West Palm Beach, Boynton Beach, Delray Beach, Lake Worth, Riviera Beach, and Wellington. PBCHRC has also advised us that Liberty Counsel (a religious organization engaged in legal advocacy) has sent letters to several of these cities threatening litigation challenging the legality of the ordinance, but to date, no case has been filed. Further, it is our understanding that, at this time, no enforcement action has been commenced by any of these cities.

Should the City Council desire to proceed as requested by PBCHRC, we have prepared, and attached, a draft ordinance prohibiting the practice of SOCE on minors based on the Model Ordinance (with some minor changes).⁴ We will await further direction on this issue.

Please feel free to contact me should you have any questions or require additional information.

cc: Leif J. Ahnell, C.P.A., C.G.F.O.

Attachment

q:\nem\2017\m&cc dgf conversion therapy 081717.docx

³ "Preemption" by the state means regulation of the issue, subject matter, or field is reserved exclusively to the state; preemption may be express (requiring a statement in the relevant statute regarding the scope of the preemption) or implied (a judicial determination that the state's regulation is so pervasive it reflects a legislative intent to fully occupy the regulatory field thereby preempting regulation by any other governmental entity).

⁴ The definition of "provider" in the Model Ordinance exempted licensed mental health professionals who are also religious leaders (using the term "clergy"), and are acting in that capacity, provided they do not hold themselves out as offering conversion therapy pursuant to their state-issued license. This has been amended to clarify that the exemption applies to all religious leaders (not just ordained "clergy") while providing religious counseling or instruction. Additionally, the "Enforcement" section has been replaced with a reference to the City Code's existing enforcement provision, but specifying that a violation will not be punishable by imprisonment. Finally, please note that although the recitals within the draft ordinance are based, exclusively, on the statements, information, studies, and materials referenced by the PBCHRC and set forth in the Model Ordinance, we have removed the footnote references. As noted above, that material will nevertheless be included in the record should the Council choose to proceed. Also, the PBCHRC has recommended inclusion of the following in a proposed ordinance: the ordinance "shall be automatically repealed should the Florida Legislature and/or any court . . . determin[e] that regulation of conversion therapy is preempted by the state of Florida." We believe this language would be superfluous since the establishment (or finding) of a preemption would render the ordinance unenforceable by operation of law (without the need for an express provision in the draft ordinance).

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AN ORDINANCE OF THE CITY OF BOCA RATON AMENDING CHAPTER 29, CODE OF ORDINANCES, TO CREATE A NEW ARTICLE VI, "PROHIBITION OF CONVERSION THERAPY ON MINORS," PROHIBITING THE PRACTICE OF CONVERSION THERAPY ON PATIENTS WHO ARE MINORS, PROVIDING FOR SEVERABILITY; PROVIDING FOR REPEALER; PROVIDING FOR CODIFICATION; PROVIDING AN EFFECTIVE DATE

WHEREAS, as recognized by major professional associations of mental health practitioners and researchers in the United States and elsewhere for nearly 40 years, being lesbian, gay, bisexual, transgender or gender nonconforming, or questioning (LGBTQ) is not a mental disease, disorder or illness, deficiency or shortcoming; and

WHEREAS, the American Academy of Pediatrics in 1993 published an article in its Journal, stating: "Therapy directed at specifically changing sexual orientation is contraindicated, since it can provoke guilt and anxiety while having little or no potential for achieving changes in orientation;" and

1 WHEREAS, the American Psychiatric Association in December 1998 published its
2 opposition to any psychiatric treatment, including reparative or conversion therapy, which
3 therapy regime is based upon the assumption that homosexuality is a mental disorder per se or
4 that a patient should change his or her homosexual orientation; and

5 WHEREAS, the American Psychological Association's Task Force on Appropriate
6 Therapeutic Responses to Sexual Orientation ("APA Task Force") conducted a systematic
7 review of peer-reviewed journal literature on sexual orientation change efforts ("SOCE"), and
8 issued its report in 2009, citing research that sexual orientation change efforts can pose critical
9 health risks to lesbian, gay, and bisexual people, including confusion, depression, guilt,
10 helplessness, hopelessness, shame, social withdrawal, suicidality, substance abuse, stress,
11 disappointment, self-blame, decreased self-esteem and authenticity to others, increased self-
12 hatred, hostility and blame toward parents, feelings of anger and betrayal, loss of friends and
13 potential romantic partners, problems in sexual and emotional intimacy, sexual dysfunction,
14 high-risk sexual behaviors, a feeling of being dehumanized and untrue to self, a loss of faith,
15 and a sense of having wasted time and resources, and

16 WHEREAS, following the report issued by the APA Task Force, the American
17 Psychological Association in 2009 issued a resolution on Appropriate Affirmative Responses to
18 Sexual Orientation Distress and Change Efforts, advising parents, guardians, young people,
19 and their families to avoid sexual orientation change efforts that portray homosexuality as a
20 mental illness or developmental disorder and to seek psychotherapy, social support, and
21 educational services that provide accurate information on sexual orientation and sexuality,
22 increase family and school support, and reduce rejection of sexual minority youth; and

23 WHEREAS, the American Psychoanalytic Association in June 2012 issued a position
24 statement on conversion therapy efforts, articulating that "As with any societal prejudice, bias
25 against individuals based on actual or perceived sexual orientation, gender identity or gender
26 expression negatively affects mental health, contributing to an enduring sense of stigma and

1 pervasive self-criticism through the internalization of such prejudice" and that psychoanalytic
2 technique "does not encompass purposeful attempts to 'convert,' 'repair,' change or shift an
3 individual's sexual orientation, gender identity or gender expression," such efforts being
4 inapposite to "fundamental principles of psychoanalytic treatment and often result in substantial
5 psychological pain by reinforcing damaging internalized attitudes;" and

6 WHEREAS, the American Academy of Child & Adolescent Psychiatry in 2012
7 published an article in its Journal stating that clinicians should be aware that there is "no
8 evidence that sexual orientation can be altered through therapy and that attempts to do so may
9 be harmful;" that there is "no medically valid basis for attempting to prevent homosexuality,
10 which is not an illness;" and that such efforts may encourage family rejection and undermine
11 self-esteem, connectedness and caring, important protective factors against suicidal ideation
12 and attempts; and that, for similar reasons cumulatively stated above, carrying the risk of
13 significant harm, SOCE is contraindicated; and

14 WHEREAS, the Pan American Health Organization, a regional office of the World
15 Health Organization, issued a statement in 2012 stating: "These supposed conversion
16 therapies constitute a violation of the ethical principles of health care and violate human rights
17 that are protected by international and regional agreements." The organization also noted that
18 conversion therapies "lack medical justification and represent a serious threat to the health and
19 well-being of affected people;" and

20 WHEREAS, in 2014, the American School Counselor Association issued a position
21 statement that states: "It is not the role of the professional school counselor to attempt to
22 change a student's sexual orientation or gender identity. Professional school counselors do not
23 support efforts by licensed mental health professionals to change a student's sexual orientation
24 or gender as these practices have been proven ineffective and harmful;" and

25 WHEREAS, a 2015 report of the Substance Abuse and Mental Health Services
26 Administration, a division of the U.S. Department of Health and Human Services, "Ending

1 Conversion Therapy: Supporting and Affirming LGBTQ Youth" further reiterates based on
2 scientific literature that conversion therapy efforts to change an individual's sexual orientation,
3 gender identity, or gender expression is a practice not supported by credible evidence and has
4 been disavowed by behavioral health experts and associations, perpetuates outdated views of
5 gender roles and identities, negative stereotypes, stating, importantly, that such therapy may
6 put young people at risk of serious harm, and recognizing that same-gender sexual orientation
7 (including identity, behavior, and attraction) is part of the normal spectrum of human diversity
8 and does not constitute a mental disorder; and

9 WHEREAS, the American College of Physicians wrote a position paper in 2015
10 opposing the use of "conversion," "reorientation," or "reparative" therapy for the treatment of
11 LGBT persons, stating that "[a]vailable research does not support the use of reparative therapy
12 as an effective method in the treatment of LGBT persons. Evidence shows that the practice may
13 actually cause emotional or physical harm to LGBT individuals, particularly adolescents or
14 young persons;" and

15 WHEREAS, at least one federal appeals court¹ found that a prohibition of SOCE does
16 not violate first amendment rights and noted that the subject ordinance only required mental
17 health providers who wish to engage in practices that seek to change a minor's sexual
18 orientation either to wait until the minor turns 18 or be subject to professional discipline, leaving
19 mental health providers free to discuss or recommend treatment and to express their views on
20 any topic; and

21 WHEREAS, the City does not intend to prevent mental health providers from
22 speaking to the public about SOCE; expressing their views to patients; recommending SOCE to
23 patients; administering SOCE to any person who is 18 years of age or older; or referring minors
24 to unlicensed counselors, such as religious leaders. This ordinance does not prevent unlicensed
25 providers, such as religious leaders, from administering SOCE to children or adults; nor does it

¹ *Pickup v. Brown*, 740 F3d 1208 (9th Cir. 2014).

1 prevent minors from seeking SOCE from mental health providers in other political subdivisions
2 or states outside of the City of Boca Raton, Florida; and

3 WHEREAS, City of Boca Raton has a compelling interest in protecting the physical
4 and psychological well-being of minors, including but not limited to lesbian, gay, bisexual,
5 transgender and questioning youth, and in protecting its minors against exposure to serious
6 harms caused by sexual orientation and gender identity change efforts; and

7 WHEREAS, the City Council hereby finds the overwhelming research demonstrating
8 that sexual orientation and gender identity change efforts can pose critical health risks to
9 lesbian, gay, bisexual, transgender or questioning persons, and that being lesbian, gay,
10 bisexual, transgender or questioning is not a mental disease, mental disorder, mental illness,
11 deficiency, or shortcoming; and

12 WHEREAS, the City Council finds minors receiving treatment from licensed therapists
13 in the City of Boca Raton, Florida, who may be subject to conversion or reparative therapy are
14 not effectively protected by other means, including, but not limited to, other state statutes, local
15 ordinances, or federal legislation; and

16 WHEREAS, the City Council desires to prohibit, within the geographic boundaries of
17 the City, the practice of sexual orientation or gender identity change efforts on minors by
18 licensed therapists only, including reparative and/or conversion therapy, which have been
19 demonstrated to be harmful to the physical and psychological well-being of lesbian, gay,
20 bisexual, transgender and questioning persons; now therefore

21
22 THE CITY OF BOCA RATON HEREBY ORDAINS:

23
24 Section 1. The Code of Ordinances of City of Boca Raton, Florida, at Chapter 9,
25 "Miscellaneous Offenses," to create a new Article VI, which shall read as follows:

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ARTICLE VI. - PROHIBITION OF CONVERSION THERAPY ON MINORS

Sec. 9-104. - Intent.

The Intent of this Ordinance is to protect the physical and psychological well-being of minors, including but not limited to lesbian, gay, bisexual, transgender and/or questioning youth, from exposure to the serious harms and risks caused by conversion therapy or reparative therapy by licensed providers, including but not limited to licensed therapists. These provisions are exercises of the police power of the City for the public safety, health, and welfare; and its provisions shall be liberally construed to accomplish that purpose.

Sec. 9-105. - Definitions.

(a) "Conversion therapy" or "reparative therapy means," interchangeably, any counseling, practice or treatment performed with the goal of changing an individual's sexual orientation or gender identity, including, but not limited to, efforts to change behaviors, gender identity, or gender expression, or to eliminate or reduce sexual or romantic attractions or feelings toward individuals of the same gender or sex. Conversion therapy does not include counseling that provides support and assistance to a person undergoing gender transition or counseling that provides acceptance, support, and understanding of a person or facilitates a person's coping, social support, and development, including sexual orientation-neutral interventions to prevent or address unlawful conduct or unsafe sexual practices, as long as such counseling does not seek to change sexual orientation or gender identity.

(b) "Minor" means any person less than 18 years of age.

(c) "Provider" means any person who is licensed by the State of Florida to provide professional counseling, or who performs counseling as part of his or her professional training under chapters 456, 458, 459, 490 or 491 of the Florida Statutes, as such chapters may be amended, including but not limited to, medical practitioners, osteopathic practitioners, psychologists, psychotherapists, social workers, marriage and family therapists, and licensed counselors. The term "provider" does not include members of the clergy or other religious

1 leaders who are acting in their roles as clergy or pastoral counselors, or are providing religious
2 counseling or instruction to congregants, provided they do not hold themselves out as providing
3 conversion therapy pursuant to any of the aforementioned Florida Statutes licenses.

4 Sec. 9-106. - Conversion therapy prohibited.

5 It shall be unlawful for any provider to practice conversion therapy on any individual
6 who is a minor regardless of whether the provider receives monetary compensation in exchange
7 for such services.

8 Sec. 9-107. - Enforcement and civil penalties.

9 (a) Any person that violates any provision of this article shall be subject to the civil
10 penalty prescribed in section 1-16 and in no instance shall a violation of this article be
11 punishable by imprisonment.

12 Section 2. If any section, subsection, clause or provision of this ordinance is held
13 invalid, the remainder shall not be affected by such invalidity.

14 Section 4. All ordinances and resolutions or parts of ordinances and resolutions and
15 all sections and parts of sections in conflict herewith shall be and hereby are repealed.

16 Section 5. Codification of this ordinance in the City Code of Ordinances is hereby
17 authorized and directed.

18 Section 6. This ordinance shall take effect immediately upon adoption.
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PASSED AND ADOPTED by the City Council of the City of Boca Raton this _____
day of _____, 2017.

CITY OF BOCA RATON, FLORIDA

ATTEST:

Susan S. Saxton, City Clerk

Susan Haynie, Mayor

Approved as to form:

Diana Grub Frieser
City Attorney

O17814

COUNCIL VOTE			
	YES	NO	ABSTAINED
MAYOR SUSAN HAYNIE			
DEPUTY MAYOR JEREMY RODGERS			
COUNCIL MEMBER ANDREA LEVINE O'ROURKE			
COUNCIL MEMBER SCOTT SINGER			
COUNCIL MEMBER ROBERT S. WEINROTH			

24

Plaintiffs' Exhibit 24
(digital media to be filed separately)

From: Brown, George S
To: Frieser, Diana Grub
Cc: Ahnell, Leif; Woika, Michael
Subject: RE: PBCHRC - Request to prohibit conversion therapy by licensed professionals in Boca Raton
Date: Tuesday, July 18, 2017 11:42:49 AM

While I find so-called "conversion therapy" inherently wrong and totally abhorrent, a local ordinance banning such practice would be extremely difficult, if not impossible, to enforce. Proving a violation (before the special magistrate) would necessarily require public disclosure by a patient or credible witness that the "treatment" had been administered in violation of the ordinance. The City has not adopted ordinances limiting or regulating professions otherwise regulated by the state. I would also be concerned that the City could, in pursuing a violation, be interfering in family decisions that, whether they be right or wrong in others' eyes, are a family matter. I don't know the background of other cities' decision making, but I think there are many reasons it is not a good idea for the City to adopt such a regulation. To me, this is not an area of local governance.

Just some comments.

From: Frieser, Diana Grub
Sent: Tuesday, July 18, 2017 11:20 AM
To: Brown, George S; Woika, Michael
Subject: FW: PBCHRC - Request to prohibit conversion therapy by licensed professionals in Boca Raton FYI, Diana

From: flagler400@gmail.com [mailto:flagler400@gmail.com] **On Behalf Of** Rand Hoch

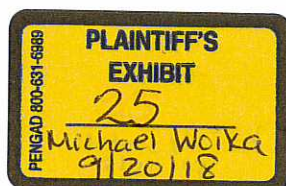
Sent: Tuesday, July 18, 2017 11:00 AM

To: O'Rourke, Andrea <AORourke@ci.boca-raton.fl.us>; Rodgers, Jeremy <JRodgers@ci.boca-raton.fl.us>; Haynie, Susan <SHaynie@ci.boca-raton.fl.us>; Weinroth, Robert <RWeinroth@ci.boca-raton.fl.us>; Singer, Scott <SSinger@ci.boca-raton.fl.us>

Cc: Ahnell, Leif <leif@ci.boca-raton.fl.us>; Frieser, Diana Grub <DGfrieser@ci.boca-raton.fl.us>

Subject: PBCHRC - Request to prohibit conversion therapy by licensed professionals in Boca Raton
Please see attached.

Judge Rand Hoch (retired)
President and Founder
Palm Beach County Human Rights Council
400 North Flagler Drive, #1402
West Palm Beach, FL 33401
[561-358-0105](tel:561-358-0105)



From: paul.schofield
To: Brown, George S; laverriere@bbfl.us; mbornstein@lakeworth.org
Subject: RE: Conversion Therapy Prohibition Ordinances
Date: Friday, July 21, 2017 11:09:02 AM

Good morning George.
I would prefer to discuss that ordinance in person. Having said that we do not have a specific enforcement mechanism and I don't have any clear idea how we could train either our Code Enforcement staff or law enforcement staff to actually enforce it. If we receive a complaint we will deal with it individually and most likely refer it to one of the state governing bodies. The M.D.'s, D.O.'s and clinician's all have their own state boards.

Paul Schofield,
Village Manager
Village of Wellington
12300 Forest Hill Blvd
Wellington, FL 33414
Phone (561) 753-2536
Fax: (561) 791-4045

From: Brown, George S [mailto:GBrown@ci.boca-raton.fl.us]
Sent: Friday, July 21, 2017 8:09 AM
To: LaVerriereL@bbfl.us; mbornstein@lakeworth.org; Paul Schofield
Subject: Conversion Therapy Prohibition Ordinances

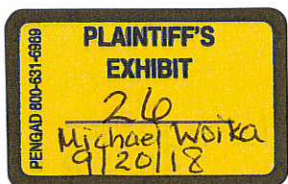
Colleagues,
Each of your cities has adopted a conversion therapy prohibition ordinance, according to information we have been provided. Have any of you established specific enforcement procedures? What methods of investigation are utilized to determine if a violation is occurring/has occurred? Have any cases been prosecuted?
Please let me know, when you have time. Thanks.

George
George S. Brown
Deputy City Manager
City of Boca Raton
201 West Palmetto Park Road
Boca Raton, FL 33432-3795
Telephone: 561-393-7703
Facsimile: 561-367-7014
gbrown@myboca.us

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The City of Boca Raton scanned this outbound message for viruses, vandals and malicious content and found this message to be free of such content.

Please be advised that Wellington is a public entity subject to Florida's broad public records law under Chapter 119, Florida Statutes. Most written communications, including email addresses, to or from Wellington employees and elected officials regarding city business are public records and are available to the public and the media upon request. Your email communications may therefore be subject to public disclosure. If you do not want your email address to be subject to disclosure as a public record, please do not send electronic mail to Wellington. Instead, contact the city by telephone at (561) 791-4000.



4

From: Brown, George S
To: "LaVerriere, Lori"
Subject: RE: Conversion Therapy Prohibition Ordinances
Date: Friday, July 21, 2017 8:40:19 AM
Attachments: image001.png
image002.png
image003.png
image004.png
image005.png
image006.png

As are ours.

From: LaVerriere, Lori [mailto:LaVerriereL@bbfl.us]
Sent: Friday, July 21, 2017 8:37 AM
To: Brown, George S
Subject: RE: Conversion Therapy Prohibition Ordinances
Agreed. Electeds received a lot of pressure from Rand Hoch.



Lori LaVerriere
City Manager
City Manager's Office
City of Boynton Beach
100 E. Boynton Beach Blvd. | Boynton Beach, Florida 33435
561-742-6010 | 561-742-6011
LaVerriereL@bbfl.us | http://www.boynton-beach.org/



America's Gateway to the Gulfstream

Please be advised that Florida has a broad public records law and all correspondence to me via email may be subject to disclosure. Under Florida records law, email addresses are public records. Therefore, your e-mail communication and your e-mail address may be subject to public disclosure.

From: Brown, George S [mailto:GBrown@ci.boca-raton.fl.us]
Sent: Friday, July 21, 2017 8:20 AM
To: LaVerriere, Lori <LaVerriereL@bbfl.us>
Subject: RE: Conversion Therapy Prohibition Ordinances

I have recommended we adopt a resolution stating our position against it, rather than an ordinance making it an offense, because we would not want to get between a family and its child based on a complaint from the child or a third party. We are in the early stages of considering the matter. I consider it a more or less unenforceable ordinance and a matter that is not something our local government should take up.

From: LaVerriere, Lori [mailto:LaVerriereL@bbfl.us]
Sent: Friday, July 21, 2017 8:14 AM
To: Brown, George S
Subject: RE: Conversion Therapy Prohibition Ordinances
Are you contemplating procedures, enforcement, etc?

Lori LaVerriere
City Manager
City Manager's Office
City of Boynton Beach
100 E. Boynton Beach Blvd. | Boynton Beach, Florida 33435
561-742-6010 | 561-742-6011
LaVerriereL@bbfl.us | http://www.boynton-beach.org/



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From: Brown, George S [mailto:GBrown@ci.boca-raton.fl.us]
Sent: Friday, July 21, 2017 8:14 AM
To: LaVerriere, Lori <LaVerriereL@bbfl.us>

Subject: RE: Conversion Therapy Prohibition Ordinances

Thanks, Lori. That is what I expected to hear.

From: LaVerriere, Lori [mailto:LaVerriereL@bbfl.us]
Sent: Friday, July 21, 2017 8:12 AM
To: Brown, George S; mbornstein@lakeworth.org; pschofield@wellingtonfl.gov
Subject: RE: Conversion Therapy Prohibition Ordinances

Hi George,

We have not established any enforcement procedures or methods of investigation. I'm thinking we will more likely be responding to a specific complaint.

Lori LaVerriere
City Manager
City Manager's Office
City of Boynton Beach
100 E. Boynton Beach Blvd. | Boynton Beach, Florida 33435
561-742-6010 | 561-742-6011
LaVerriereL@bbfl.us | http://www.boynton-beach.org



America's Gateway to the Gulfstream

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From: Brown, George S [mailto:GBrown@ci.boca-raton.fl.us]
Sent: Friday, July 21, 2017 8:09 AM
To: LaVerriere, Lori <LaVerriereL@bbfl.us>; mbornstein@lakeworth.org; pschofield@wellingtonfl.gov
Subject: Conversion Therapy Prohibition Ordinances

Colleagues,

Each of your cities has adopted a conversion therapy prohibition ordinance, according to information we have been provided. Have any of you established specific enforcement procedures? What methods of investigation are utilized to determine if a violation is occurring/has occurred? Have any cases been prosecuted?

Please let me know, when you have time. Thanks.

George

George S. Brown
Deputy City Manager
City of Boca Raton
201 West Palmetto Park Road
Boca Raton, FL 33432-3795
Telephone: 561-393-7703
Facsimile: 561-367-7014
gbrown@myboca.us

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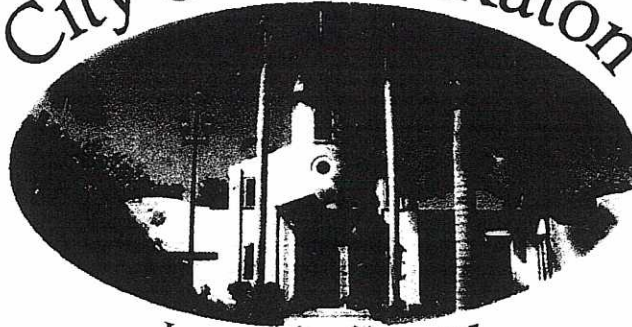
Please note: Florida has a very broad public records law. Most written communications to or from local officials regarding city business are public records, and are available to the public and media upon request. Your e-mail communications may therefore be subject to public disclosure.

The City of Boca Raton scanned this outbound message for viruses, vandals and malicious content and found this message to be free of such content.

Please note: Florida has a very broad public records law. Most written communications to or from local officials regarding city business are public records, and are available to the public and media upon request. Your e-mail communications may therefore be subject to public disclosure.

The City of Boca Raton scanned this outbound message for viruses, vandals and malicious content and found this message to be free of such content.

City of Boca Raton



Incorporated 1925

ORDINANCE

5407

1

2 AN ORDINANCE OF THE CITY OF BOCA RATON

3 AMENDING CHAPTER 9, CODE OF ORDINANCES, TO

4 CREATE A NEW ARTICLE VI, "PROHIBITION OF

5 CONVERSION THERAPY ON MINORS," PROHIBITING THE

6 PRACTICE OF CONVERSION THERAPY ON PATIENTS

7 WHO ARE MINORS; PROVIDING FOR SEVERABILITY;

8 PROVIDING FOR REPEALER; PROVIDING FOR

9 CODIFICATION; PROVIDING AN EFFECTIVE DATE

10

11 WHEREAS, as recognized by major professional associations of mental health

12 practitioners and researchers in the United States and elsewhere for nearly 40 years, being

13 lesbian, gay, bisexual, transgender or gender nonconforming, or questioning (LGBTQ) is not a

14 mental disease, disorder or illness, deficiency or shortcoming; and

15 WHEREAS, the American Academy of Pediatrics in 1993 published an article in its

16 Journal, stating: "Therapy directed at specifically changing sexual orientation is contraindicated,

17 since it can provoke guilt and anxiety while having little or no potential for achieving changes in

18 orientation;" and



1 WHEREAS, the American Psychiatric Association in December 1998 published its
2 opposition to any psychiatric treatment, including reparative or conversion therapy, which
3 therapy regime is based upon the assumption that homosexuality is a mental disorder per se or
4 that a patient should change his or her homosexual orientation; and

5 WHEREAS, the American Psychological Association's Task Force on Appropriate
6 Therapeutic Responses to Sexual Orientation ("APA Task Force") conducted a systematic
7 review of peer-reviewed journal literature on sexual orientation change efforts ("SOCE"), and
8 issued its report in 2009, citing research that sexual orientation change efforts can pose critical
9 health risks to lesbian, gay, and bisexual people, including confusion, depression, guilt,
10 helplessness, hopelessness, shame, social withdrawal, suicidality, substance abuse, stress,
11 disappointment, self-blame, decreased self-esteem and authenticity to others, increased self-
12 hatred, hostility and blame toward parents, feelings of anger and betrayal, loss of friends and
13 potential romantic partners, problems in sexual and emotional intimacy, sexual dysfunction,
14 high-risk sexual behaviors, a feeling of being dehumanized and untrue to self, a loss of faith,
15 and a sense of having wasted time and resources; and

16 WHEREAS, following the report issued by the APA Task Force, the American
17 Psychological Association in 2009 issued a resolution on Appropriate Affirmative Responses to
18 Sexual Orientation Distress and Change Efforts, advising parents, guardians, young people,
19 and their families to avoid sexual orientation change efforts that portray homosexuality as a
20 mental illness or developmental disorder and to seek psychotherapy, social support, and
21 educational services that provide accurate information on sexual orientation and sexuality,
22 increase family and school support, and reduce rejection of sexual minority youth; and

23 WHEREAS, the American Psychoanalytic Association in June 2012 issued a position
24 statement on conversion therapy efforts, articulating that "As with any societal prejudice, bias
25 against individuals based on actual or perceived sexual orientation, gender identity or gender
26 expression negatively affects mental health, contributing to an enduring sense of stigma and

1 pervasive self-criticism through the internalization of such prejudice" and that psychoanalytic
2 technique "does not encompass purposeful attempts to 'convert,' 'repair,' change or shift an
3 individual's sexual orientation, gender identity or gender expression," such efforts being
4 inapposite to "fundamental principles of psychoanalytic treatment and often result in substantial
5 psychological pain by reinforcing damaging internalized attitudes;" and

6 WHEREAS, the American Academy of Child & Adolescent Psychiatry in 2012
7 published an article in its Journal stating that clinicians should be aware that there is "no
8 evidence that sexual orientation can be altered through therapy and that attempts to do so may
9 be harmful;" that there is "no medically valid basis for attempting to prevent homosexuality,
10 which is not an illness;" and that such efforts may encourage family rejection and undermine
11 self-esteem, connectedness and caring, important protective factors against suicidal ideation
12 and attempts; and that, for similar reasons cumulatively stated above, carrying the risk of
13 significant harm, SOCE is contraindicated; and

14 WHEREAS, the Pan American Health Organization, a regional office of the World
15 Health Organization, issued a statement in 2012 stating: "These supposed conversion
16 therapies constitute a violation of the ethical principles of health care and violate human rights
17 that are protected by international and regional agreements." The organization also noted that
18 conversion therapies "lack medical justification and represent a serious threat to the health and
19 well-being of affected people;" and

20 WHEREAS, in 2014, the American School Counselor Association issued a position
21 statement that states: "It is not the role of the professional school counselor to attempt to
22 change a student's sexual orientation or gender identity. Professional school counselors do not
23 support efforts by licensed mental health professionals to change a student's sexual orientation
24 or gender as these practices have been proven ineffective and harmful;" and

25 WHEREAS, a 2015 report of the Substance Abuse and Mental Health Services
26 Administration, a division of the U.S. Department of Health and Human Services, "Ending

1 Conversion Therapy: Supporting and Affirming LGBTQ Youth" further reiterates based on
2 scientific literature that conversion therapy efforts to change an individual's sexual orientation,
3 gender identity, or gender expression is a practice not supported by credible evidence and has
4 been disavowed by behavioral health experts and associations, perpetuates outdated views of
5 gender roles and identities, negative stereotypes, stating, importantly, that such therapy may
6 put young people at risk of serious harm, and recognizing that, same-gender sexual orientation
7 (including identity, behavior, and attraction) is part of the normal spectrum of human diversity
8 and does not constitute a mental disorder; and

9 WHEREAS, the American College of Physicians wrote a position paper in 2015
10 opposing the use of "conversion," "reorientation," or "reparative" therapy for the treatment of
11 LGBT persons, stating that "[a]vailable research does not support the use of reparative therapy
12 as an effective method in the treatment of LGBT persons. Evidence shows that the practice may
13 actually cause emotional or physical harm to LGBT individuals, particularly adolescents or
14 young persons;" and

15 WHEREAS, at least one federal appeals court found that a prohibition of SOCE does
16 not violate first amendment rights and noted that the subject ordinance only required mental
17 health providers who wish to engage in practices that seek to change a minor's sexual
18 orientation either to wait until the minor turns 18 or be subject to professional discipline, leaving
19 mental health providers free to discuss or recommend treatment and to express their views on
20 any topic (See Pickup v. Brown, 740 F.3d 1208 (9th Cir. 2014)); and

21 WHEREAS, the City does not intend to prevent mental health providers from
22 speaking to the public about SOCE; expressing their views to patients; recommending SOCE to
23 patients; administering SOCE to any person who is 18 years of age or older; or referring minors
24 to unlicensed counselors, such as religious leaders. This ordinance does not prevent unlicensed
25 providers, such as religious leaders, from administering SOCE to children or adults; nor does it

1 prevent minors from seeking SOCE from mental health providers in other political subdivisions
2 or states outside of the City of Boca Raton, Florida; and

3 WHEREAS, City of Boca Raton has a compelling interest in protecting the physical
4 and psychological well-being of minors, including but not limited to lesbian, gay, bisexual,
5 transgender and questioning youth, and in protecting its minors against exposure to serious
6 harms caused by sexual orientation and gender identity change efforts; and

7 WHEREAS, the City Council hereby finds the overwhelming research demonstrating
8 that sexual orientation and gender identity change efforts can pose critical health risks to
9 lesbian, gay, bisexual, transgender or questioning persons, and that being lesbian, gay,
10 bisexual, transgender or questioning is not a mental disease, mental disorder, mental illness,
11 deficiency, or shortcoming; and

12 WHEREAS, the City Council finds minors receiving treatment from licensed therapists
13 in the City of Boca Raton, Florida, who may be subject to conversion or reparative therapy are
14 not effectively protected by other means, including, but not limited to, other state statutes, local
15 ordinances, or federal legislation; and

16 WHEREAS, the City Council desires to prohibit, within the geographic boundaries of
17 the City, the practice of sexual orientation or gender identity change efforts on minors by
18 licensed therapists only, including reparative and/or conversion therapy, which have been
19 demonstrated to be harmful to the physical and psychological well-being of lesbian, gay,
20 bisexual, transgender and questioning persons; now therefore

21
22 THE CITY OF BOCA RATON HEREBY ORDAINS:

23
24 Section 1. Chapter 9, "Miscellaneous Offenses," Article VI, "Prohibition of
25 Conversion Therapy on Minors," is created to read:

1 ARTICLE VI. - PROHIBITION OF CONVERSION THERAPY ON MINORS

2 Sec. 9-104. - Intent.

3 The Intent of this Ordinance is to protect the physical and psychological well-being of
4 minors, including but not limited to lesbian, gay, bisexual, transgender and/or questioning youth,
5 from exposure to the serious harms and risks caused by conversion therapy or reparative
6 therapy by licensed providers, including but not limited to licensed therapists. These provisions
7 are exercises of the police power of the City for the public safety, health, and welfare; and its
8 provisions shall be liberally construed to accomplish that purpose.

9 Sec. 9-105. - Definitions.

10 (a) "Conversion therapy" or "reparative therapy means," interchangeably, any
11 counseling, practice or treatment performed with the goal of changing an individual's sexual
12 orientation or gender identity, including, but not limited to, efforts to change behaviors, gender
13 identity, or gender expression, or to eliminate or reduce sexual or romantic attractions or
14 feelings toward individuals of the same gender or sex. Conversion therapy does not include
15 counseling that provides support and assistance to a person undergoing gender transition or
16 counseling that provides acceptance, support, and understanding of a person or facilitates a
17 person's coping, social support, and development, including sexual orientation-neutral
18 interventions to prevent or address unlawful conduct or unsafe sexual practices, as long as such
19 counseling does not seek to change sexual orientation or gender identity.

20 (b) "Minor" means any person less than 18 years of age.

21 (c) "Provider" means any person who is licensed by the State of Florida to provide
22 professional counseling, or who performs counseling as part of his or her professional training
23 under chapters 456, 458, 459, 490 or 491 of the Florida Statutes, as such chapters may be
24 amended, including but not limited to, medical practitioners, osteopathic practitioners,
25 psychologists, psychotherapists, social workers, marriage and family therapists, and licensed
26 counselors. The term "provider" does not include members of the clergy or other religious

1 leaders who are acting in their roles as clergy or pastoral counselors, or are providing religious
2 counseling or instruction to congregants, provided they do not hold themselves out as providing
3 conversion therapy pursuant to any of the aforementioned Florida Statutes licenses.

4 Sec. 9-106. - Conversion therapy prohibited.

5 It shall be unlawful for any provider to practice conversion therapy on any individual
6 who is a minor regardless of whether the provider receives monetary compensation in exchange
7 for such services.

8 Sec. 9-107. - Enforcement and civil penalties.

9 (a) Any person that violates any provision of this article shall be subject to the civil
10 penalty prescribed in section 1-16 and in no instance shall a violation of this article be
11 punishable by imprisonment.

12 Section 2. If any section, subsection, clause or provision of this ordinance is held
13 invalid, the remainder shall not be affected by such invalidity.

14 Section 4. All ordinances and resolutions or parts of ordinances and resolutions and
15 all sections and parts of sections in conflict herewith shall be and hereby are repealed.

16 Section 5. Codification of this ordinance in the City Code of Ordinances is hereby
17 authorized and directed.

18 Section 6. This ordinance shall take effect immediately upon adoption.

19

1 PASSED AND ADOPTED by the City Council of the City of Boca Raton this 10th
2 day of October, 2017.

3
4 CITY OF BOCA RATON, FLORIDA

5
6 ATTEST:

7
8
9 Susan S. Saxton
10 Susan S. Saxton, City Clerk

11
12 Susan Haynie
13 Susan Haynie, Mayor

14 Approved as to form:

15
16 Diana Grub Frieser
17 Diana Grub Frieser
18 City Attorney

19
20
21
22 017814

COUNCIL VOTE			
	YES	NO	ABSTAINED
MAYOR SUSAN HAYNIE	✓		
DEPUTY MAYOR JEREMY RODGERS	✓	✓	
COUNCIL MEMBER ANDREA LEVINE O'ROURKE	✓		
COUNCIL MEMBER SCOTT SINGER	✓		
COUNCIL MEMBER ROBERT S. WEINROTH	✓		

From: Rand Hoch
To: [Frieser, Diana Grub](#)
Cc: [Carly Cass](#); [Chauncey Graham](#); [Dan Hall](#); [Hutch Floyd](#); [Jamie Todd Foreman-Plakas](#); [JP Sasser](#); [Marcie Hall](#); [Meredith Ockman](#); [Michael Fowler](#); [Rae Franks](#); [Rand Hoch](#); [Trent Steele](#)
Subject: Re: PBCHRC - Otto and Hamilton v. Palm Beach and Boca Raton - Complaint (conversion therapy)
Date: Tuesday, June 19, 2018 8:07:48 PM
Attachments: [image003.png](#)
[image002.png](#)

Diana,

Denise and I have been chatting about this for days. (She just left for Paris this afternoon, so she's gone for a while). Assistant County Attorneys Rachel Fahey and Kim Phan will be handling the case.

I had asked Denise if the County was interested in seeing if we could secure outside counsel on a pro bono basis. They declined. We also reminded them that we can pay for experts expenses, etc and they took us up on that one. We'll do the same for Boca, but I trust you'll be coordinating with the County.

The good thing is, Liberty Counsel filed the exact same lawsuit against the City of Tampa in December - *Vazzo et al v. City of Tampa*, Florida. So, my suggestion would be to contact the Tampa City Attorney there and see if you can copies of the pleadings in Word so your staff doesn't even have to retype them in full.

I think the County wants to take the lead on this case. So, let me know when you and the County want to get together.

Rand

P.S. We were fortunate to get Judge Robin Rosenberg on the case. However, PBCHRC Voters Alliance has endorsed her husband, Michael McAuliffe, in his campaign for circuit court judge. So, PBCHRC will be working behind the scenes with the parties on the case so that Judge Rosenberg does not get recused. That having been said, we'll also be working with the National Center for Lesbian Rights and the Southern Poverty Law Center, who will probably file an amicus brief on behalf of some LGBTQ entity in PB County. Also, PBCHRC will be available for the media.

On Tue, Jun 19, 2018 at 4:52 PM, Frieser, Diana Grub <DGfrieser@ci.boca-raton.fl.us> wrote:

Rand,

Thank you for letting us know about the denial of the Plaintiff's request for preliminary injunction. As you probably realize, we were unaware a hearing was scheduled, and are unaware of any circumstances that would justify a hearing without notice to the City. We did confirm with the County that it had been served with the complaint this morning, but as of this email the City has not been served.

We appreciate the interest from you and the Palm Beach County Human Rights Council regarding



this newly filed litigation. We recall the assurances and support pledged by the PBCHRC during the City's consideration of the Ordinance prohibiting conversion therapy with respect to minors which is the focus of the complaint and believe those resources will be valuable. I believe it would be appropriate for us to touch base regarding the defense of the Ordinance once the City is served, and, at that time, we can discuss coordination of the financial and legal resources PBCHRC is prepared to provide to the City to supplement the City's efforts.

In addition, can you advise if you have been in touch with the County, and whether PBCHRC has similarly pledged to support the defense of the conversion therapy ordinance adopted by the County?

Thanks,
Diana

Diana Grub Frieser | City Attorney

City of Boca Raton, Office of the City Attorney
201 W. Palmetto Park Road • Boca Raton, FL 33432

P 561-393-7716 | dgfrieser@myboca.us

Stay connected...



From: Rand Hoch [<mailto:rand-hoch@usa.net>]
Sent: Tuesday, June 19, 2018 1:33 PM
To: Frieser, Diana Grub <DGFrieser@ci.boca-raton.fl.us>
Subject: Re: PBCHRC - Otto and Hamilton v. Palm Beach and Boca Raton - Complaint

Diana,

Good news so far.

Robin Rosenberg is the Judge.

She denied the preliminary injunction w/our prejudice because the defendants have not been served.

PBC was served today.

Rand

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----- Forwarded message -----
From: Rand Hoch <rand-hoch@usa.net>

To: "Weinroth, Robert" <RWeinroth@ci.boca-raton.fl.us>
Cc: Mayor Susan Haynie <shaynie@ci.boca-raton.fl.us>, "Andrea Levine O'Rourke" <aorourke@ci.boca-raton.fl.us>, Jeremy Rodgers <jrodgers@ci.boca-raton.fl.us>, "Singer, Scott" <SSinger@ci.boca-raton.fl.us>, Diana Grub Frieser <DGFrieser@ci.boca-raton.fl.us>, Leif Ahnell <leif@ci.boca-raton.fl.us>
Bcc:
Date: Mon, 25 Dec 2017 13:26:36 -0500
Subject: Re: Ltr - to City of Boca Raton re speech ban 12222017.pdf
Thank you for forwarding The Liberty Counsel's letter to me. Just what I needed to reach on Christmas Day!

As you may know, The Liberty Counsel is a hate group i which advocates for anti-LGBT discrimination under the guise of religious liberty. (See, www.splcenter.org/fighting-hate/extremist-files/group/liberty-counsel).

The organization has made numerous threats about filing suit against the City of West Palm Beach, Palm Beach County and several other South Florida governmental entities which have enacted -- or are in the process of enacting -- bans on conversion therapy. However, despite the existence of more than a dozen bans in South Florida to date, The Liberty Counsel chose to file their lawsuit (on the same grounds as espoused in their December 22, 2107 diatribe sent to you) in federal court in Tampa, where the panel of federal judges is generally more conservative than here in South Florida.

That lawsuit was filed just days before the Palm Beach County Board of County Commissioners passed their conversion therapy ban and iIn my opinion, it was filed as an attempt to intimidate the County Commissioners -- who obviously were not intimidated.

The Broward County Board of County Commissioners is set to have their Final Reading on their conversion therapy ban on January 9, 2018, So, it appears likely that The Liberty Counsel is trying to intimidate another body of elected officials which is taking action to protecting children from the harm of conversion therapy. I am confident that despite the hollow threats made by The Liberty Counsel, the Broward County Commissioners will not be intimidated by The Liberty Counsel.

As mentioned in prior correspondence, **no challenge to a conversion therapy ban has ever succeeded anywhere in the U.S.** And on four occasions (including last May with Associate Justice Neil Gorsuch sitting on the Court), the U.S. Supreme Court has declined to take up lower cases which were filed (and failed to) overturn conversion therapy bans.

Moreover, having followed this hate group and their litigation for more than two decades, I cannot recall them ever having filed the same lawsuit in two different parts of the same state. So, the letter to your and the City Council Members appears to be just another idle threat meant to grab some media attention and appease The Liberty Counsel's donors in Boca Raton.

Following the Holidays, PBCHRC will provide Mayor Haynie and the City Council with a more detailed response to the December 22, 2017 letter. In the interim, I trust that Boca Raton's elected officials will not be intimidated by the Liberty Counsel's latest threat of litigation.

IN THE UNITED STATES DISTRICT COURT FOR
THE SOUTHERN DISTRICT OF FLORIDA

ROBERT W. OTTO, PH.D. LMFT,)	
individually and on behalf of his patients,)	
and JULIE H. HAMILTON, PH.D., LMFT,)	
individually and on behalf of her patients,)	Civil Action No. <u>9:18-cv-80771-RLR</u>
)	
Plaintiffs,)	
)	
v.)	
)	
CITY OF BOCA RATON, FLORIDA, and)	
COUNTY OF PALM BEACH, FLORIDA,)	
)	
Defendants.)	

DECLARATION OF PLAINTIFF JULIE H. HAMILTON, PH.D., LMFT

1. I am over the age of 18 years, and I am a named Plaintiff in this case. I have personal knowledge of the matters set forth in this declaration, and would testify competently as to such matters if called to do so.

2. Since the filing of the Verified Complaint in this action on June 13, 2018 (DE 1), I have taken the following actions in connection with my professional practice as a licensed marriage and family therapist in Palm Beach County, Florida:

a. Paid the City of Boca Raton local business tax for the annual periods ending September 30, 2018 and September 30, 2019 (true and correct copies of my City of Boca Raton Business Tax Receipt/Certificate of Use for the annual period ending September 30, 2018, and my Payment Receipt for my online payment of the City of Boca Raton local business tax for the annual period ending September 30, 2019, are attached hereto as Exhibits A-1 and A-2, respectively);

b. Paid the Palm Beach County local business tax for a Boca Raton office for the annual period ending September 30, 2019 (a true and correct copy of my Palm Beach County Local Business Tax Receipt for the annual period ending September 30, 2019 is attached hereto as Exhibit A-3).

c. Provided in-person counselling in the City of Boca Raton consistent with my licensure and applicable law.

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

EXECUTED this October 9, 2018.

/s/ Julie H. Hamilton
Julie H. Hamilton

LOCAL BUSINESS TAX
RECEIPT # 18 00069044

CITY OF BOCA RATON
BUSINESS TAX AUTHORITY

THIS IS NOT A BILL
Any changes in name, address, suite, ownership, ect. will require a new application within 15 days to avoid penalty or the license is null and void.

HAMILTON, JULIE HARREN
HAMILTON, JULIE HARREN
4400 N FEDERAL HWY 21

**BUSINESS TAX RECEIPT
CERTIFICATE OF USE
EXPIRES: 9/30/18**

Business Tax fee: 26.25
Penalty fee: .00
Late fee: .00
Additional fee: 73.00
Transfer fee: .00
Total paid: 99.25

HAMILTON, JULIE HARREN
2853 WHITE TROUT LN
WEST PALM BEACH FL 33411

has paid the business tax at the above address for the period beginning the 1st day of October and ending the 30th day of September to engage in the business, profession or occupation of:

Classification: EXECUTIVE SUITE SERVICE OTC

Comments: MARRIAGE AND FAMILY THERAPY

WELCOME to the City of Boca Raton. We are proud to have your business in our community. You may call us at 561-393-7937 if you have questions relating to your business needs. We are located at 200 NW 2 Avenue. Lobby hours are 8:00 AM to 4:00 PM Monday thru Friday, except Wednesday, hours are 8:00 AM to 3:00 PM. Our mailing address is 201 W. Palmetto Park Rd, Boca Raton, FL. 33432.

VERIFY all information on your Business Tax Receipt / Certificate of Use and notify us immediately if there is an error.

CHANGES REQUIRE A NEW APPLICATION TO BE SUBMITTED WITH APPROPRIATE FEE(S) AND DOCUMENTATION WITHIN 15 DAYS OF THE CHANGE. If you make any changes to the business; examples: change of location within the City, expansion of space, change of ownership, change of business name, change of applicant/qualifier name, change of mailing address, change in nature of business operated, or add a new type of business at the same or at a different location, a new application must be filed within 15 days of the change in order to keep the account current and avoid paying a penalty. Make sure Division of Corporations reflects all changes.

VISIT our website at: WWW.MYBOCA.US, click on 'BUSINESS', then 'BUSINESS TAX', then on the left side, click on 'FORMS AND REPORTS' to download both City and County applications.

POST the top portion of this document at the above location in a place where it may be seen at all times.

DEACTIVATION: If you cease to operate this business entity, you must return this document to our office with proof that the Division of Corporations filing has been inactivated, including both Corporate and Fictitious Name filings. If the business location has changed, provide proof that the principal address has been changed on Division of Corporations. All signage for discontinued business must be removed within 10 days.

A COURTESY RENEWAL NOTICE will be sent 30 to 60 days prior to expiration. If you do not receive the renewal notice, you must still pay the tax on time. Late penalties will not be waived if you do not receive the notice. The Business Tax may be renewed in person, by drop-box in City Hall, by mail or by using the website and Click "e-services". To renew online you will need your Business Tax Receipt # and "pin" #. These numbers will be provided on your renewal notice on the top right corner.

NOTE: At this time classifications that need a license/permit/certification or regulated requirement cannot renew online.

FAILURE TO PAY your Business Tax on or before the close of business on September 30 will cause penalties to be applied to the business tax renewal as indicated below.

PAYMENT AND PENALTY SCHEDULE

DATE PENALTY EFFECTIVE:	SEPT 30	OCT 1	NOV 1	DEC 1	JAN 1	MAR 1
PENALTY:	0%	10%	15%	20%	25%	25% + \$250.00

Payment Receipt

Thank you for your payment.

Transaction Results:

Transaction Status

Success

Auth Code

09516D

Reference Number

93140084

Payment Method:

Charged To

Visa *****3224

Account Holder

Hamilton, Julie H

Billing Address

2853 White Trout Ln, West Palm Beach, FL 33411

Transaction Overview:

Total Amount

\$105.00

Payment Date

EXHIBIT A-2

Charge Details

Charge Description	Amount
18-00069044	\$105.00
Total	\$105.00

[« Go back and pay for a different account. \(./index.html?OWASP_CSRFTOKEN=U5TB-SPAY-RTGU-TRDE-2P5W-Y0K7-56BB-T1MY\)](#)

ANNE M. GANNON
CONSTITUTIONAL TAX COLLECTOR
Serving Palm Beach County

P.O. Box 3353, West Palm Beach, FL 33402-3353
 www.pbctax.com Tel: (561) 355-2264

****LOCATED AT****

4400 North Federal HWY Ste 210
 BOCA RATON, FL 33431

Serving you.

TYPE OF BUSINESS	OWNER	CERTIFICATION #	RECEIPT #/DATE PAID	AMT PAID	BILL #
MARRIAGE & FAMILY THERAPIST	HAMILTON JULIE HARREN	MT1728	U18.743703 - 09/28/18	\$33.00	B40192049

is valid only when receipted by the Tax Collector's Office.

STATE OF FLORIDA
PALM BEACH COUNTY
2018/2019 LOCAL BUSINESS TAX RECEIPT

LBTR Number: 2018112160
EXPIRES: SEPTEMBER 30, 2019

JULIE HARREN
 JULIE HARREN
 2853 WHITE TROUT LANE
 WEST PALM BEACH, FL 33411

This receipt grants the privilege of engaging in or managing any business profession or occupation within its jurisdiction and **MUST** be conspicuously displayed at the place of business and in such a manner as to be open to the view of the public.