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IN THE SUPREME COURT OF FLORIDA

JAMES APTHORP,

Petitioner, CASE NO. SC14 - 924

v.

KEN DETZNER, as Secretary of
State of Florida

_____

MOTION FOR LEAVE TO FILE AMICUS CURIAE BRIEF IN SUPPORT OF PETITIONER

The League of Women Voters of Florida, pursuant to Florida Rule of Appellate Procedure 9.370, moves this Court for leave to file an amicus curiae brief in support of Petitioner James Apthorp.[1] In support of this motion, proposed amicus states:

Interests of Proposed Amicus

The League of Women Voters (the "LWV") was founded in 1920 as an outgrowth of the struggle to win voting rights for women. The LWV is comprised of nonpartisan, community based organizations that encourage Americans to participate actively in government and the electoral process. The LWV is a grassroots organization, working at the national, state and local levels with Leagues in all 50 states, the District of Columbia, Puerto Rico, the Virgin Islands

[1]Due to the expedited nature of these proceedings, the League is filing its Amicus Curiae Brief contemporaneously with this Motion so the Court will have immediate access to the Brief if this Motion is granted.

and Hong Kong, in addition to the hundreds of local Leagues nationwide. The LWV currently has over 150,000 members and supporters, and has worked for over 90 years to ensure that citizens do not face unnecessary barriers when registering to vote and to casting ballots.

The League of Women Voters of Florida (the "League") is the Florida affiliate of the LWV. It began in 1939 and now has over 20,000 members, supporters and volunteers operating out of 30 chapters across the state. The League holds candidate forums, issues Voter Guides to help inform citizens on local races and ballot amendments, and sponsors public forums to encourage Florida's citizens and elected officials to broaden their understanding of key issues, while promoting engaged citizenship through an informed and active participation in government.

The League has a particular interest in this matter because it involves the interpretation of the Sunshine Amendment. The League worked to collect signatures in order to place the Sunshine Amendment on the ballot, and worked extensively to educate the citizens of Florida on the need for the Amendment as well as its substance and purpose.

Issue to be Addressed

The League proposes to address the issue raised in the Petition, specifically whether the terms of Section 112.31425, Florida Statutes, which authorizes

candidates for public office to disclose the existence of "qualified blind trusts" but not disclose the contents of those trusts, is inconsistent with Article II, Section 8(a) of the Florida Constitution, and is therefore unconstitutional.

How the Proposed Amici Can Assist the Court

The League has a long history of working to ensure the Florida's citizens are fully informed on issues relevant to the political process. Its work to pass the Sunshine Amendment was part of the League's stated purpose, and it has a strong interest in seeing that the terms and intent of the Amendment are followed and not subverted. The League believes it can provide additional insight as to the Sunshine Amendment itself as well as the conflict between Section 112.31425, Florida Statutes, and the Amendment.

Consent of All Parties

The undersigned has contacted counsel for the parties in this action, and counsel for the Petitioner consent to the League filing an amicus curiae brief. Counsel for Respondent Florida Department of State has indicated that the Department is opposed to the motion. Counsel for Respondent the Office of the Attorney General has not indicated a position despite a phone call and email to that office.

Conclusion

For the reasons set forth above, the League of Women Voters of Florida respectfully requests leave to file an amicus curiae brief in support of Petitioner James Apthorp.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I CERTIFY that on May 20, 2014, the foregoing was e-filed pursuant to Florida Rule of Judicial Administration 2.525 and that the foregoing was served by email in compliance with Florida Rule of Judicial Administration 2.516(b)(1)(A) to: Talbot D'Alemberte and Patsy Palmer, D'Alemberte and Palmer, PLLC, Post office Box 10029, Tallahassee, Florida 32302-2029, and to dalemberte@dalembertandpalmer.com and palmer@dalembertandpalmer.com; and to Florida Attorney General Pam Bondi, at oag.civil.eserve@myfloridalegal.com;

and to Ashley Davis, Assistant General Counsel, at Ashley.davis@dos.myflorida.com.

/s/Christopher V. Carlyle_____
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