

IN THE CIRCUIT COURT OF THE
2ND JUDICIAL CIRCUIT IN AND
FOR LEON COUNTY, FLORIDA

Case No. 2011 CA 1584

GEORGE WILLIAMS, et al., :
 :
 Plaintiffs, :
 :
 v. :
 :
 RICK SCOTT, et al., :
 :
 Defendants. :

2011 SEP 21 PM 2:10

FILED

**AFFIDAVIT
OF
BRETT SANDLIN
IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT**

State of Florida)
) ss
County of Alachua)

BEFORE ME, the undersigned authority, personally appeared **Brett Sandlin**, who after being first duly cautioned and sworn, deposes and states as follows:

1. He is over the age of 18 and is an intervenor on the side with the plaintiff in the captioned case.
2. He is a firefighter employed by Alachua County, Florida.
3. He currently is and has been a special risk member of the Florida Retirement System since 1997.

IN COMPUTER
D.B.

4. He is a member and president of Local 3852 of the International Association of Firefighters, AFL-CIO.

5. Local 3852 of the International Association of Firefighters, AFL-CIO, is recognized by Alachua County as the bargaining representative for the firefighters employed by Alachua County.

6. Local 3852 of the International Association of Firefighters, AFL-CIO, and Alachua County, Florida, have a collective bargaining agreement (union contract) covering the period October 1, 2010, through September 30, 2013. (Attached as an exhibit.)

7. The Florida Retirement System (FRS) is the applicable pension plan for the firefighters, including Brett Sandlin, who are employed by Alachua County, Florida, referenced in the collective bargaining agreement between Local 3852 of the International Association of Firefighters, AFL-CIO, and Alachua County, Florida, covering the period October 1, 2010, through September 30, 2013.

8. Brett Sandlin is a beneficiary of the collective bargaining agreement between Local 3852 of the International Association of Firefighters, AFL-CIO, and Alachua County, Florida, covering the period October 1, 2010, through September 30, 2013, in regard to wages and the conditions of employment.

9. Brett Sandlin is a beneficiary of the collective bargaining agreement between Local 3852 of the International Association of Firefighters, AFL-CIO, and Alachua County, Florida, covering the period October 1, 2010, through September 30, 2013, in regard to wages and the conditions of employment.

10. There was no collective bargaining involving Local 3852 of the International Association of Firefighters, AFL-CIO, concerning Senate Bill 2100 of the 2011 session of the Florida Legislature..

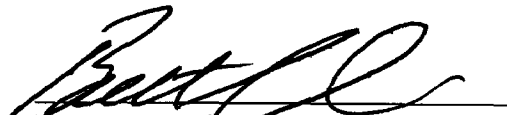
11. There was no collective bargaining involving Alachua County, Florida, concerning Senate Bill 2100 of the 2011 session of the Florida Legislature.

12. There was no collective bargaining involving the changes to the Florida Retirement System contained in Senate Bill 2100 of the 2011 session of the Florida Legislature.

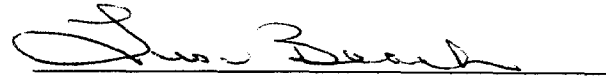
13. There was no collective bargaining involving the changes to the Florida Retirement System contained in Senate Bill 2100 of the 2011 session of the Florida Legislature in regard to making the Florida Retirement System employee contributory.

14. There was no collective bargaining involving the changes to the Florida Retirement System contained in Senate Bill 2100 of the 2011 session of the Florida Legislature in regard to amendment to the COLA provisions of the Florida Retirement System.

FURTHER AFFIANT SAYETH NOT.


Brett Sandlin

Sworn to and Subscribed before me this 19 day of September, 2011.


Notary Public, State of Florida

My Commission Expires:

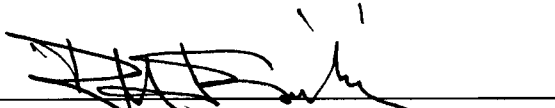
The foregoing instrument was acknowledged before me this 19 day of September, 2011, by Brett Sandlin, who is personally known to me or who has produced Personally known as identification.

Certificate of Service



I certify that a copy of the foregoing has been furnished by mail this 20th day of September, 2011, to: **Ronald G. Meyer**, Esquire, **Jennifer S. Blohm**, Esquire, and **Lynn C. Hearn**, Esquire, Meyer, Brooks, Demma and Blohm, P.A., 131 North Gadsden St., Tallahassee, FL 32301; **Pamela L. Cooper**, Esquire, Florida Education Association, 300 East Park Ave., Tallahassee, FL 32301; **Alice O'Brien**, Esquire, National Education Association, 1201 16th St., N.W., Washington, D.C. 20036; **Pamela Jo Bondi**, Esquire, **Blaine H. Winship**, Esquire, and **Timothy D. Osterhaus**, Esquire, Office of the Attorney General, State of Florida, The Capitol, PL-01, Tallahassee, FL 32399-1050; **G. Hal Johnson**, Esquire, 300 East Brevard St., Tallahassee, FL 32301; **Gary D. Wilson**, Esquire, **Jill S. Schwartz**, Esquire, Jill S. Schwartz & Associates, P.A., 180 North Park Ave., Suite 200,

Winter Park, FL 32789; **Donald D. Slesnick**, Esquire, **James C. Casey**, Esquire, Slesnick and Casey, LLP, 2701 Ponce De Leon Blvd., Suite 200, Coral Gables, FL 33134; **Aaron Nisenson**, Esquire, International Union of Police Associations, 1549 Ringling Blvd., Suite 600, Sarasota, FL 34236; **Richard Siwica**, Esquire, Egan Lev & Siwica, P.A., P.O. Box 2231, Orlando, FL 32802; **Osnat K. Rind**, Esquire, **Holly E. Van Horsten**, Esquire, Phillips, Richard & Rind, P.A., 9360 S.W. 72 St., Suite 283, Miami, FL 33173; and **Jonathan G. Rose**, Esquire, **David R. Godofsky**, Esquire, **Doug Hinson**, Esquire, **Richard Siegel**, Esquire, Alston & Bird LLP, 950 "F" Street, N.W., Washington, D.C. 20004.



RICHARD A. SICKING, ESQ.
Attorney for Intervenor, Sandlin
1313 Ponce de Leon Blvd., #300
Coral Gables, Florida 33134
Telephone (305) 446-3700
Fla. Bar No. 073747
Email: sickingpa@aol.com