

1 IN THE FIFTEENTH JUDICIAL CIRCUIT COURT

2 IN AND FOR PALM BEACH COUNTY, FLORIDA

3 CASE NO. 86-6149 (CL) J

4 BRENDA E. SMITH, as Personal
5 Representative of the Estate
6 of LESLIE NICOLE SMITH, deceased,
and BRENDA E. SMITH and STEVE
SMITH, individually,

7 Plaintiffs,

8 vs.

9 THE STATE OF FLORIDA DEPARTMENT
10 OF TRANSPORTATION, et al.,

11 Defendants.

12
13 - - -
14 COURT REPORTER'S TRANSCRIPT OF
15 THE CLOSING ARGUMENTS OF THE PLAINTIFF TAKEN
16 BEFORE THE COURT AND A JURY
17 - - -

18 West Palm Beach, Florida
19 Friday, February 23, 1990
20 10:25 a.m. - 3:30 p.m.
21 - - -

22 APPEARANCES:

23 SEARCY, DENNEY, SCAROLA, BARNHART & SHIPLEY, PA
24 2139 Palm Beach Lakes Boulevard
25 West Palm Beach, Florida 33409
Attorneys for the Plaintiffs
BY: CHRISTOPHER SEARCY, ESQ.
and LANCE BLOCK, ESQ.

DAVIS, HOY, CARROLL & ISAACS, P.A.
1655 Palm Beach Lakes Boulevard
Forum III Building, Suite 1010
West Palm Beach, Florida 33401
Attorneys for the Defendants
BY: MICHAEL B. DAVIS, ESQ.

COPY

16
17
18
19
20
21
22
23
24
25

MR. SEARCY: May it please the Court. Folks, I would like to start by thanking each and every one of you for the close attention that you have paid to the evidence in this case. I am sure that the justice system of this country thanks you for the close attention that you have paid to the evidence because we all know that the best way to insure justice is through

1 the jury system and attentive jurors
2 and justice is what this case is all
3 about.

4 When you go back in the room
5 today to decide this case you will
6 have awesome power. Juries determine
7 the rights of Senators, Congressmen,
8 rich men, poor men, Presidents. ~~It is~~
9 -- you embody today the power of our
10 government and you have the unlimited
11 power to right a wrong. Unlimited at
12 least as far as money damages are
13 concerned.

14 ~~If you could~~ -- if it weren't
15 limited to money. If you could have a
16 magic wand, if you had the power to go
17 back there and say, this is wrong, it
18 never should have happened, it was a
19 comedy of errors.

20 They put up a piece of junk that
21 was never meant to withstand these
22 conditions and therefore we are going
23 to undo it and we are going to make it
24 like it never happened and we are
25 going to give Steve and Brenda Smith

1 their daughter back uninjured, never
2 hurt, that is all that the Smith's
3 would ever want and they would be the
4 happiest people in the world.

5 But you do have that limitation
6 on your power. You cannot do that.
7 You do have an unlimited power insofar
8 as the rendering of a money damage
9 verdict goes and it's very important
10 that you follow the Court's
11 instructions and follow the evidence
12 that you have heard and paid attention
13 to and follow the Court's instructions
14 and if you do that you will render
15 justice and if anybody back there when
16 you go back to decide this case, if
17 anybody says, gets overwhelmed by the
18 magnitude of the damages here and
19 says, "Well, all the money in the
20 world won't bring her back," stop them
21 say, Wait a minute. That is not the
22 law. We are supposed to follow the
23 law. And the Court told us that the
24 law is that we are to measure in money
25 damages the fair and reasonable nature

1 of these damages, the full and total
2 magnitude of the damages and that it
3 should be fair and just in light of
4 all the evidence. And it doesn't
5 matter what that ends up being, we
6 need to follow the law and follow the
7 evidence.

8 You might have asked yourselves,
9 how is it that of all these people
10 that were called for jury duty two
11 weeks ago and all the people that came
12 in here that I ended up sitting on
13 this jury and there's a saying from
14 the Bible that many are called and few
15 are chosen. Why were you chosen? I
16 chose you because I believed you --

17 MR. DAVIS: Excuse me, Your Honor,
18 that is an improper statement in front
19 of the jury.

20 THE COURT: Sustained as to why
21 you chose them, Mr. Searcy.

22 MR. SEARCY: On the voir dire
23 examination each of you stated that
24 you would follow the law and you would
25 follow the evidence and if the

1 evidence showed a verdict of great
2 magnitude you would render a verdict
3 of great magnitude, whatever that
4 amount.

5 Now Lance has talked with you --
6 the way you are going to decide this
7 case is when we finish with these
8 closing statements the Court is going
9 to tell you what the law is.

10 He is going to instruct you on
11 the law and then he is going to give
12 you a verdict form and the verdict
13 form is going to have six questions on
14 it and they'll be a little more
15 lengthy than this but this represents
16 the gist of those questions and Lance
17 has talked to you about the first,
18 what would be the first three
19 questions, and he has shown you that
20 on the question of, was the department
21 of transportation negligent? The
22 evidence has shown that the answer is
23 clearly yes.

24 Was Brenda Smith negligent the
25 overwhelming evidence shows that she

1 in fact was not negligent and acted as
2 a reasonable mother would act under
3 the circumstances.

4 And three would be if you were to
5 find Brenda Smith negligent you would
6 answer that that compares the
7 percentage of negligence, but I think
8 you will find that to be inapplicable
9 and not answer that one.

10 And that brings us to four, the
11 total damages for the wrongful death
12 of Leslie Nicole Smith, total damages
13 of Brenda Smith and total damages of
14 Steve Smith and we also have the
15 personal injury to Brenda Smith.
16 Brenda's personal injury damages and
17 then Steve's damage as a result of
18 Brenda's personal injury damages. And
19 that is what I want to talk with you
20 about.

21 What has the evidence showed with
22 regard to the damages in this case?
23 The evidence -- the evidence has shown
24 that Brenda and Steve Smith had a
25 beautiful, young, tender, precious

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

little girl that they loved more than their own lives. Their entire lives centered around her. Their whole reason for being was to care for her and love her and nurture her.

You have seen from the evidence that when this incompetently, negligently constructed sign came helicoptering through the air and came through that car like a giant machete and chopped Leslie Nicole Smith's head in half, that it ripped the heart out of Brenda Smith and ripped the heart out of Steve Smith. It exploded their world leaving them to stagger through life like a punch drunk fighter that is out on his feet, is taking a -- is taking one step after another but doesn't know what has happened to him.

And that their lives will never as long as they live be the same. Until one has brought a child into this world and loved that child and hugged that child and kissed that child and nurtured that child and

1 raised that child and then had that
2 child suddenly torn away from them in
3 a violent, brutal fashion, one cannot
4 fully appreciate the magnitude of the
5 pain and the grief that apparent
6 undergoes.

7 When Leslie Nicole Smith had her
8 head cut in half by this sign it was a
9 death sentence for Leslie Nicole
10 Smith. And it was a life sentence for
11 her parents.

12 The evidence has shown you that
13 it was a life sentence of Brenda
14 Smith, multiple times a day.

15 THE CLERK: Ten minutes, counsel.

16 MR. SEARCY: Every time she sees
17 or feels the scar on her head, every
18 time she sees her little girl Lindsay
19 Nicole Smith do something
20 heartwarming, something ^{dropping} that's beyond
21 her control, just as if they took this
22 photograph out of this envelope,
23 somebody takes this and shoves it in
24 front of her brain, it's been four
25 years. You have heard the doctor,

1 four years since this happened and
2 there has been no lessening of the
3 living nightmare, no lessening of the
4 frequency, multiple times a day, that
5 is what Brenda Smith sees.

6 For the rest of her life, 48
7 years, you have heard the experts, you
8 have heard the experts Doctor Cheshire
9 and Doctor Platt who have analyzed
10 this and who have helped us to get
11 insight into this and they have told
12 us that won't ever change.

13 With professional help and
14 professional therapy maybe we can keep
15 Brenda Smith from ending up in a
16 lifelong psychiatric hospitalization
17 by helping her to understand her
18 feelings and help her to cope with
19 them but that won't ever change.

20 Steve Smith. A life sentence for
21 Steve Smith. Steve Smith. Look at
22 him when you go back into the jury
23 room, look at him, the love that is
24 reflected on that face is the mirror
25 image of the pain and the devastation

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

that he feels.

To try ~~and~~ to understand what someone's lost, we have to try to understand what they had, ^{before they lost it} and the reason that as long as they live they will never -- they'll never be able to get over this pain is because they loved this little girl more than their own life and the strength of that love is now the strength of their pain. They weren't ever going to stop loving her and they won't ever stop hurting for her.

Steve Smith couldn't talk to his wife about this. You saw the evidence, there was just, for several weeks there was no conversation. The first time there was ever any conversation about this was when Doctor Cheshire took Steve Smith into the hospital and said, Mr. Smith, you need to understand what your wife is going through. She saw your child's face get cut off.

And for the first time Steve

1 Smith took a look into the window, the
2 big picture window into hell that his
3 wife had been looking through and he
4 broke down and he cried and he
5 screamed and he had a catharsis and he
6 talked with her and that is the only
7 thing that gave Brenda any will to
8 live is that she knew that her husband
9 needed her and came home.

10 The second time that Steve Smith
11 has really dealt with this you saw.
12 He hasn't been able to go and see a
13 psychiatrist about this. His
14 testimony, if you will remember was,
15 when he looked into the casket and saw
16 his daughter, that he collapsed, they
17 had to catch him, he could not look
18 into it again. Brenda is sitting up
19 there reading fairy tales to her
20 daughter and he can't even bear to
21 look.

22 They go out to the grave site and
23 as the funeral's over and he is
24 leaving and he sees them starting to
25 lower that casket, as you recall he

1 falls down when the thought hits him
2 that they are going to put his little
3 girl into a hole in the ground and
4 throw dirt on her and he can't -- he
5 falls down on the ground and has to be
6 finally lifted and escorted away from
7 the cemetery. That is the feeling
8 that Steve Smith has.

9 The overwhelming devastation and
10 destruction of his family. He is not
11 a vocal man but he is a strong, proud
12 man and a devoted man and he was
13 unable to take care of his family, his
14 little girl was brutally killed and he
15 has got to live with that for the rest
16 of his life.

17 THE CLERK: 15 minutes, counsel.

18 MR. SEARCY: Thank you.

19 If evil personified had stayed up
20 for nights and said I want to -- I
21 want to figure out how it is, the
22 worst way I can hurt Brenda and Steve
23 Smith for life? I want to do the very
24 worst thing I can possibly do to them.
25 It could not have come up with a

1 better plan as to cut a child's head
2 in half in front of their parents and
3 have them get out, trying desperately
4 against all odds to find somebody to
5 take them to a hospital for their
6 little child whose blood and brains
7 are bleeding out all over them and
8 whose life is going.

9 Doctor Cheshire said that if a
10 mother has had a child die in her arms
11 she will never as long as she lives
12 forget what that feels like. That is
13 the damage that you need to measure by
14 your verdict in this case.

15 There's personal injury. The
16 personal injury case, of course, is
17 overshadowed dramatically by the
18 horrible tragedy of this death, and
19 you have seen the scar on Brenda
20 Smith's head.

21 She's got some other problems
22 too, but -- and it's not all that --
23 that is not a horrible scar, the
24 problem is there's the numbness and
25 the scar and the problem is that is a

1 brand. That is the brand of the
2 incompetence and the negligence and
3 the injustice of the Department of
4 Transportation and every time she sees
5 that and every time she feels that
6 numbness somebody opens up this
7 envelope and shoves it in front of her
8 face and the Court will tell you on
9 the personal injury you should award
10 an amount that will compensate her for
11 her mental pain and suffering over
12 this injury. Her pain and suffering
13 over that injury is the multiple
14 reminders every day of the living
15 nightmare.

16 Steve Smith, the law recognizes
17 that if you hurt one spouse you hurt
18 the other. If the wife cries, the
19 husband tastes salt.

20 Steve Smith, you have heard
21 Brenda's testimony, she couldn't bear
22 to touch him for awhile. He couldn't
23 talk with her, they couldn't go home,
24 their life has been impaired. They
25 don't have any joy or happiness in

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

their life any more. And that is what these elements refer to.

Mary Sue Mathuse, the nurse, 17 years in nursing, seen an awful lot of bad things. You heard her testimony. Never in 17 years of nursing have I seen anything this bad. She was the one that had to hold Leslie's face on, hold it in place to try to give her mouth to mouth resuscitation while Brenda Smith observed.

THE CLERK: 15 minutes, counsel.

MR. SEARCY: Thank you.

Money damages. It will not bring Leslie Nicole Smith back, we can't do that. That is not within your power but that is the way we keep score. That is the way our society and the way our government keeps score. We don't go out and kill someone else's child, we keep score, money damages, and in this case we cannot bring Leslie Nicole Smith back but we can do justice.

You remember Larry Platt's

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

testimony when he talked to you about intensifiers of grief? He said there are things that are known intensifiers of grief. Untimely, violent, preventable. Unjust, in red. Maybe someone was looking in. Unjust. We can't do anything about it being sudden and we can't do anything about it being violent, but we can do something about it being unjust and Brenda and Steve Smith are very interested in that.

This case screams out for justice and they have pursued justice for four years and that is one intensifying factor that you can do something about.

You can erase this one, you can show that this system will give them justice. Please follow the law and follow the evidence and render a verdict for Brenda Smith for five million dollars for the wrongful death of her daughter and for Steve Smith for three million dollars for the

1 wrongful death of his daughter.

2 On the personal damages I believe
3 that you should render -- I am going
4 to let you decide that because there's
5 a -- the personal injury damages
6 interveaves so much with the death
7 damage you should assign some amount
8 in addition to the wrongful death
9 verdict for Brenda's personal injury
10 damages and the way it causes the,
11 enhances the intensity of those
12 images. I am not going to make a
13 suggestion I will let you decide that.

14 This is extremely important. If
15 you follow the law and you follow the
16 evidence and you render a verdict for
17 five million dollars to Brenda Smith
18 and three million dollars to Steve
19 Smith you will be telling the Smiths
20 by your verdict that despite the
21 actions of this bureaucracy of the
22 state with their Wizard of Oz
23 microburst and their \$260,000 --
24 \$260.00 expert that says that it's all
25 the mother's fault, that despite that

1 conduct, the --

2 MR. DAVIS: Objection.

3 MR. SEARCY: -- the real
4 government --

5 MR. DAVIS: Excuse me, counsel.
6 Objection. Trying to suggest a jury
7 verdict should be based on matters
8 which are outside the scope --

9 THE COURT: Overruled.

10 MR. SEARCY: That this
11 government, not through some
12 beurocratic agency, but through its
13 jury system, recognizes the magnitude
14 of their loss, shares their grief and
15 places great value on the love that
16 they have for their daughter.

17 If you do that, you will give
18 them justice. They can't ever have
19 their daughter back. At least let
20 them have justice. Thank you.

21 * * * * *

22
23
24
25

1 Just muddying it up, hoping you will
2 grasp at a straw and buy something.
3 You can't do that if you are going to
4 follow the law.

5 You have got to apply the
6 evidence, the evidence you have before
7 you, and there's nothing to support
8 this comparative negligence claim.
9 Use your common sense, despite all the
10 experts, you know what -- you know
11 what the facts are here. You have got
12 -- you know what to do with this case.

13 Use your common sense. By the
14 evidence and the law the judge
15 instructs you go back there and do
16 what is right. Thank you.

17 MR. SEARCY: Folks, I know you
18 have been here a long time and I am
19 just going to be up here for ten
20 minutes, so if you can muster your
21 courage and your energy to let me say
22 a few things I would appreciate it and
23 then I am going to give you the
24 responsibility I have been carrying on
25 my shoulders and it will be your time

1 to go back and to decide the fate of
2 Brenda and Steve Smith. It will be
3 your responsibility and before handing
4 you that very heavy, the heaviest of
5 responsibilities, I want to say a few
6 things about what Mr. Davis has said.

7 Now I think maybe it's symbolic,
8 if you will notice that the very first
9 thing Mr. Davis did is to try to cover
10 up from your view the pictures of
11 Leslie Nicole Smith. She is what this
12 case is all about and in listening to
13 this evidence and deciding this case
14 and doing justice, don't let the
15 Department of Transportation cover her
16 up or sweep her under a carpet.
17 Decide this case on this law and this
18 evidence and give the parents some
19 justice, some feeling that her
20 daughter's death was not entirely
21 meaningless, some feeling that there
22 is somebody in our system that gives
23 their family, their daughter, their
24 love for their daughter the dignity
25 that it deserves.

1 Mr. Davis says to you that now
2 you have got to put aside sympathy and
3 emotion. The Court's going to tell
4 you that in deciding this case you
5 should not be unduly swayed by
6 prejudice, passion or sympathy for or
7 against any party and we
8 wholeheartedly concur for that.

9 You will note that we have not
10 asked anybody for sympathy. We --
11 they have had sympathy. If they had a
12 dollar for every tear that has been
13 cried, it would be a lot more than
14 eight million dollars.

15 We are not in here asking for
16 sympathy, we are in here asking for a
17 money damage verdict that measures the
18 full magnitude of the damages to Steve
19 and Brenda Smith, the damages that the
20 Court will tell you is the mental pain
21 and suffering they have undergone
22 every day of their lives for the past
23 four years and the mental pain and
24 suffering they will undergo every day
25 of their lives for the next 48 years

1 in Brenda's case and the next 40 years
2 in Steve's case.

3 Mr. Davis has said, well now, the
4 plaintiff in this case has the burden
5 of proof. Well, we have carried that
6 burden of proof: You have heard the
7 explicit testimony of Brenda Smith and
8 of Steve Smith, of the experts who
9 analyzed this, Doctor Cheshire, we
10 brought you Doctor Platt, one of the
11 foremost grief and grieving experts in
12 the world.

13 We have brought you Mary Sue
14 Mathuse, Jody Abercrombie, Betty
15 Jurkowski, her mother, we have shown
16 you photographs of the damage and we
17 have clearly by the greater weight of
18 the evidence by a landslide we have
19 shown you that this is the worst
20 damage there can be.

21 You cannot hurt a human being any
22 worse than this. This is the ultimate
23 hurt. And it's up to you to measure
24 that ultimate hurt and five million
25 dollars for Brenda Smith and three

1 million dollars for Steve Smith is my
2 recommendation to you of what that
3 measurement ought to be. It's not
4 limited to that. You have heard it,
5 and there is six of you, you are the
6 collective conscience of this
7 community.

8 And when you come back, Steve and
9 Brenda are out here, they'll be here
10 for the instructions and they'll be
11 here to look you in the eye when you
12 come back with their verdict and you
13 need to tell them by that verdict that
14 you recognize the magnitude of their
15 loss. If you don't, if you only give
16 them half a verdict, the problem with
17 that is that half justice is half
18 injustice, and they have had more
19 injustice than any two human beings
20 ought to have in a lifetime. And Mr.
21 Davis would have you compound that
22 injustice by an unfair verdict.
23 Please, don't be fooled at this late
24 point. You have listened so closely,
25 you have understood the case all

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

along. Don't be fooled by any clever arguments. Render a verdict that fully measures the magnitude of their damages.

Now Mr. Davis didn't present one single shred of evidence to rebut the damages of the Smiths. He didn't bring in one psychiatrist, he didn't bring in one grief expert, he didn't bring in one friend or neighbor, he didn't bring in one physician, he didn't bring in an iota of evidence to contradict the proof of our damages in any way.

It is totally unrebutted and totally uncontradicted. What did he do? He couldn't even find a dry microburst to argue against this with, so he tried to argue against it in damages and he tried to make up some arguments that don't have anything to do with the law that the Court will instruct you on or the evidence you heard. He got up and he said, well now, I agree that the money can't

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

replace the child and --

THE CLERK: Five minutes,
counsel.

MR. SEARCY: What is that?

THE CLERK: Five minutes.

MR. SEARCY: Thank you. Money
won't replace the death of the child
and eight million dollars won't make
it any better than 16 million dollars
or any better than four million
dollars. That's -- he is asking you
to not follow the law when he makes
that argument.

The law is not what will replace
the child because all of the gold in
Fort Knox will never replace her. And
that is wrong. Don't consider that.
The judge is going to tell you that
what you want to do is you want to
render a verdict that will measure the
full damages of the Plaintiffs and he
will tell you that their damages are
their mental pain and suffering over
the wrongful death of their child and
that the verdict you render should be

1 fair and just in light of all of the
2 evidence. That is what the law is,
3 that is what the evidence is, and that
4 is what we have argued to you.

5 Mr. Davis then says that, well
6 now, do you remember Doctor Cheshire
7 said that there's a psychosis and
8 neurosis and anxiety syndrome in that
9 order and that she -- he said hers
10 would be in the anxiety syndrome.
11 That is not correct.

12 If you will recall, Doctor
13 Cheshire said that when she was in the
14 hospital going around in a dark room
15 reading fairy tales to Leslie and
16 singing songs to Leslie, that she was
17 probably closer to psychosis than
18 neurosis.

19 He has told you and Larry Platt
20 has told you that this -- that both
21 Steve and Brenda have pathological
22 grief. It's beyond their control to
23 ever get better and even with
24 psychiatric help even three times a
25 week psychiatric help they may never

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

get better. They may get worse. They certainly would get worse if their quest for justice is thwarted.

Doctor Cheshire said that what has happened with them is the most painful of all the psychiatric stressors known to mankind, that a human being cannot be hurt worse than that, he described that she had physical symptoms and physical ailments, stemming from the mental pain and suffering that she suffered, which puts it in an entirely different and very serious category.

He said she has severe stress syndrome and unresolved grief reaction, pathological grief.

Then Mr. Davis argues to you, well now, let's figure out what their medical bills are. We didn't put in -- and he says, well, let's figure out what her medical bills are, and then give them ten times that.

Now the judge is not going to tell you that the wrongful death

1 damages have anything whatsoever to do
2 with medical bills. The medical bills
3 would be on the personal injury claim
4 and we didn't even put in past medical
5 bills.

6 The damages in this case are so
7 horrible that the medical bills in
8 this case pale to insignificance, so
9 if you were to follow Mr. Davis'
10 argument, since we put in no medical
11 bills for the past, then ten times
12 zero would be zero and, according to
13 his argument, you would measure their
14 damages for the four years in the past
15 and for all of the living nightmare
16 they have been through by zero. That
17 does not make any sense.

18 If you want to play mental games,
19 as Mr. Davis seems to do, then let's
20 take an -- instead of measuring it by
21 medical bills, let's take another
22 irrelevant factor, let's take Vern
23 Roberts who charges \$260.00 an hour,
24 for the mental pain and suffering.

25 THE CLERK: One minute left,

1 counsel. One minute left.

2 MR. SEARCY: And if you do that
3 and you figure 16 waking hours in the
4 day for Brenda and Steve Smith and
5 multiply that by three hundred and
6 sixty-five and then multiply it by 48
7 years, you are going to find their
8 damages, according to Vern Roberts'
9 standard, to be \$82,000,000, apiece.

10 And that shows you -- and you can
11 render a verdict for that but we have
12 tried to recommend to you what is
13 conservative and fair and just in the
14 light of all of the evidence, it will
15 be your decision, Brenda and Steve
16 know what we have requested and I hope
17 that your verdict will be in that
18 exact amount or for something more.

19 We have left to your discretion
20 the amount of personal injury damages
21 above the wrongful death damages.

22 THE CLERK: Time, counsel.

23 MR. SEARCY: Thank you very much,
24 folks.

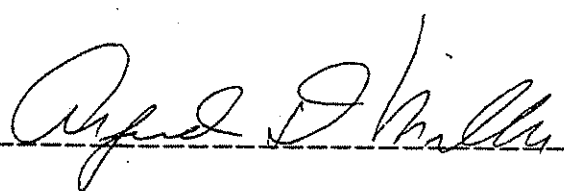
25

1 THE STATE OF FLORIDA)
2)
3 COUNTY OF PALM BEACH)

4 I, Alfred D. Miller, Notary Public,
5 State of Florida, do hereby certify that the
6 foregoing proceedings were held as hereinafter
7 set out;

8 That I was authorized to and did
9 report in machine shorthand the proceedings in
10 said hearing, and that the foregoing and annexed
11 pages comprise a true and correct transcription
12 of my stenotype notes of the proceedings;

13 IN TESTIMONY WHEREON, I have hereunto
14 affixed my official signature this 13th day of
15 March, 1990.

16
17
18 

19 _____
20 ALFRED D. MILLER, Notary Public,
21 State of Florida. My commission
22 expires October 12, 1993.