

ORDINANCE NO. _____

AN ORDINANCE OF THE BOARD OF COUNTY COMMISSIONERS OF PINELLAS COUNTY, FLORIDA, CREATING DIVISION 5 OF ARTICLE VI, CHAPTER 22, OF THE PINELLAS COUNTY CODE OF ORDINANCES, ENTITLED "SHORT TERM RENTALS"; PROVIDING DEFINITIONS; ESTABLISHING A CERTIFICATE OF USE PROGRAM FOR SHORT TERM RENTAL PROPERTIES; PROVIDING FOR INSPECTIONS OF SHORT TERM RENTAL PROPERTIES TO ENSURE CONSISTENCY WITH THE FLORIDA BUILDING CODE AND FLORIDA FIRE PREVENTION CODE; PROVIDING FOR SHORT TERM RENTAL PROPERTY ADVERTISING REQUIREMENTS; PROVIDING PROVISIONS FOR THE REGULATION OF OCCUPANCY OF SHORT TERM RENTAL PROPERTIES; PROVIDING PARKING REGULATIONS FOR SHORT TERM RENTAL PROPERTIES; PROVIDING FOR PENALTIES FOR NONCOMPLIANCE; PROVIDING FOR SEVERABILITY; PROVIDING FOR INCLUSION IN CHAPTER 22 OF THE CODE OF ORDINANCES WHICH GOVERNS BUILDINGS AND BUILDING REGULATIONS; PROVIDING FOR SCRIVENER'S ERRORS; AND PROVIDING AN EFFECTIVE DATE.

WHEREAS, the purpose of this Ordinance is to amend and update the provisions of Chapter 22 of the Pinellas County Code, Buildings and Building Regulations, adding a new Division 5 to Article VI of Chapter 22, entitled "Short Term Rentals"; and

WHEREAS, regulating the use of buildings as short term rentals (also known as short term vacation rentals and short term rental properties) in a manner allowed by Florida Statutes is in the best interests of the citizens of Pinellas County; and

WHEREAS, the most appropriate location for the provisions governing short term rentals is in Chapter 22, Buildings and Building Regulations; and

WHEREAS, prior to 2011, Florida's cities and counties regulated short term rentals, under the home rule authority granted to them by the Florida Constitution; and

WHEREAS, the 2011 Florida Legislature enacted House Bill 883 (Florida Chapter 2011-119, Laws of Florida) (hereafter "Chapter 2011-119") which preempted the local regulation of short term vacation rentals, (also known, identified, and defined herein as "short term rentals"), said properties being defined as transient rentals less than thirty (30) days in duration and commonly located in residential areas; and

WHEREAS, the 2014 Florida Legislature enacted Senate Bill 356 (Florida Chapter 2014-71, Laws of Florida) (hereafter "Chapter 2014-71") which rescinded the preemption of local government regulation of short term rentals, but provided that a local law, ordinance, or regulation adopted after June 1, 2011, may not prohibit short term rentals or regulate the duration or frequency of rental of short term rentals; and

WHEREAS, Chapter 2014-71 returned control to local governments to mitigate the effects of short term rentals for the purpose of making them safer, more compatible with their surrounding neighborhoods, and to make rental unit owners accountable for their proper operation; and

WHEREAS, as a result of Chapter 2014-71 short term rentals cannot be broadly prohibited; and

WHEREAS, single-family residential neighborhoods and their required infrastructure are generally designed to accommodate typical single-family residential homes with two (2) to three (3) persons per household on average; and

WHEREAS, local governments apply design standards tailored to residential neighborhoods for their roads, driveways, sidewalks, emergency services, planning, public shelters, emergency evacuation plans, solid waste collection, utilities, buffers, and craft regulations for the purpose of assessing infrastructure impacts and corresponding fair and proportionate impact/connection fees; and

WHEREAS, full time single-family home residents inherently understand their physical surroundings and inherent risks due to the familiarity arising from daily use; and

WHEREAS, short term rental occupants, due to the transient nature of their occupancy, are unfamiliar with local hurricane evacuation plans, the location of fire extinguishers, resident exit routes, pool and home safety features, and other similar safety measures that would readily be provided to guests in traditional lodging establishments; and

WHEREAS, short term rental owners may live elsewhere and not experience the quality of life problems and negative impacts associated with larger, unregulated short term rental units on residential neighborhoods; and

WHEREAS, short term rentals with no application of mitigating standards when located in residential neighborhoods can create disproportionate impacts related to their size, excessive occupancy, excessive vehicular traffic and parking and the lack of proper facilities if left unregulated; and

WHEREAS, some short term rental owners will make investments in upgrading building safety measures of their rental properties whereas other owners will not make such investments without local requirements and an ongoing inspection/enforcement program; and

WHEREAS, short term rentals locating within established neighborhoods can disturb the quiet enjoyment of the neighborhood, lower property values, and burden the design layout of a typical neighborhood; and

WHEREAS, the presence of short term rentals within single-family dwelling units in established residential neighborhoods can create negative impacts, which include, but are not limited to, excessive noise, on-street parking, accumulation of trash, and diminished public safety; and

WHEREAS, traditional lodging establishments (hotels, motels, and bed and breakfasts) are restricted to commercial and other non-residential areas where intensity of uses is separated from less busy and quieter residential areas; and

WHEREAS, traditional lodging establishments are governed by more stringent standards, undergo annual inspections, and have more stringent operational and business requirements; and

WHEREAS, traditional lodging establishments are often required to make roadway improvements and/or pay much higher transportation, water, sewer, and other impact fees to offset the infrastructure demands they create; and

WHEREAS, permanent residents within residential neighborhoods often establish long-term friendships, social norms and a sense of community which often leads to mutual respect among property owners on an ongoing basis; and

WHEREAS, a single-family dwelling home is typically the largest investment a family will make in their lifetime, with the home functioning as the center of the family unit; and

WHEREAS, permanent residents within established residential neighborhoods deserve the right to tranquility and peaceful enjoyment of their home without excessive intrusion by transient occupants in the neighborhood; and

WHEREAS, Pinellas County promotes tourism, including appreciation and enjoyment of the county's abundant preserved natural areas, historic sites, pristine beaches, and walking and bicycling paths that make Pinellas County unique among Florida's coastal counties; and

WHEREAS, some municipalities in Pinellas County, and many local jurisdictions in the State of Florida, and across the nation have standards in place to minimize the negative impacts caused by short term rentals; and

WHEREAS, current short term rental industry practice is to charge a flat rental fee for the term of the lease, regardless of the transient occupant count, which incentivizes the common practice for lessees of oversized structures used as short term rentals to increase the transient occupant count, spreading the cost burden for the rental term among as many payers as possible; and

WHEREAS, the County desires to encourage short term rentals that are safe, fit in with the character of the neighborhood, provide positive impacts for tourism, increase property values, and achieve greater neighborhood compatibility; and

WHEREAS, Pinellas County seeks to balance respect for private property rights and incompatibility concerns between the investors in short term rental properties and families residing in permanent single-family residences in established residential neighborhoods through the use of reasonable regulatory standards; and

WHEREAS, while Pinellas County's average family size is 2.93 persons, the County is providing, based on the available sleeping spaces and common area in a given single family residence, for significantly greater temporary occupancy within a short term rental, subject to a reasonable regulatory framework; and

WHEREAS, these regulations are deemed necessary by the Pinellas County Board of County Commissioners to preserve property values and to protect the health, safety, and general welfare of permanent residents, property owners, investors and transient occupants and visitors alike; and

WHEREAS, these regulations are being promulgated by the Pinellas County Board of County Commissioners to supplement, but not replace, any existing federal or state law or regulation, or other controls within established residential neighborhoods served by a homeowners' association; and

WHEREAS, these regulations do not regulate duration or frequency of short term rentals, but are intended to address the frequent change of many transient occupants housed within a single-family dwelling within an established residential neighborhood; and

WHEREAS, the application of minimum life/safety requirements to short term rentals, along with other minimum standards, ensures that transient occupants are provided the same minimum level of protection as is provided for single- and two-family residences utilized as hotels, motels, and dormitories; and

WHEREAS, sleeping rooms as so designated within short term rental units shall be recognized in the same manner as bedrooms within single-family residential homes, with the same requirements as are currently provided within local, state, and federal regulations, as applicable; and

WHEREAS, short term rentals operate as commercial enterprises, subject to additional regulatory requirements beyond those normally required of single-family and two-family residences, including business licensing by the State of Florida Department of Business and Professional Regulation's Division of Hotels and Restaurants, and collecting and remitting various sales taxes to state and local government; and

WHEREAS, a short term rental property is a commercial lodging activity; and

WHEREAS, some short term rental properties are being used exclusively as rentals by their investors and owners; and

WHEREAS, the establishment of minimum business practices, such as the provision of both lease-specific and property-specific information to lessees, and the designation of a local short term rental responsible party, ensures that the private property rights of the short term rental owner are balanced with the needs of the County to protect visitors and tourists and to preserve the general welfare through its limited regulatory power; and

WHEREAS, the County, through its existing regulatory framework, will issue certificates to short term rentals conforming to these standards, which will in turn provide a level playing field amongst all providers of short term rental units; and

WHEREAS, this ordinance additionally establishes an enforcement mechanism for those short term rental properties which do not adhere to the standards on an initial or continuing basis, with the overall goal of the short term rental unit program being compliant with the standards and not punitive in its scope.

NOW, THEREFORE, BE IT ORDAINED by the Board of County Commissioners of Pinellas County, Florida in regular meeting duly assembled this ____ day of _____20____, that:

SECTION 1. RECITALS. The recitals above are incorporated herein.

SECTION 2. Chapter 22 (Buildings and Building Regulations), Article VI (Housing Code), Division 5 of the Pinellas County Code is hereby created as set forth below.

Chapter 22, Article VI

Division 5. – Short Term Rentals

Sec. 22-319. Short Term Rentals

(a) Purpose. The intent of short term rentals is to allow for an individual dwelling unit to be rented to an individual or party at a lease term that is less than one month while protecting the immediate vicinity from associated negative impacts. Short term rentals generally occur in typical residential units and mostly within residential neighborhoods.

(b) Applicability. This section will apply to short term rentals consisting of individual dwelling units and the rental period for said unit is more than three times in a calendar year for periods of less than 30 days.

(c) This section is not applicable to hotels or motels and bed and breakfast uses, or other residential dwelling units that are rented for periods over one month.

(d) Areas Embraced. The areas embraced by this chapter will be all lands within the unincorporated area of Pinellas County.

(e) Conflicting Terms. To the extent any Pinellas County Ordinances or provisions of the Pinellas County Code governing short term rentals, short term rental properties, and short term vacation rentals conflict with the provisions of this Division 5, the provisions of this Division will govern.

(f) Definitions. The following terms as used in this article are defined as set forth hereinafter:

Bedroom means a room that can be used for sleeping and that:

- (1) For site-built dwellings, has a minimum of 70 square foot of conditioned space and minimum ceiling height in accordance with the Florida Building Code and complies with the Pinellas County Code Section 22-300 (dwelling space);
- (2) For manufactured homes, is constructed according to the standards of the United States Department of Housing and Urban Development and has a minimum of 50 square feet of floor area;
- (3) Is located along an exterior wall;
- (4) Has a closet and a door or an entrance where a door could be reasonably installed; and
- (5) Has an emergency means of escape and rescue opening to the outside in accordance with the Florida Building Code;
- (6) A room may not be considered a bedroom if it is used to access another room except a bathroom or closet;
- (7) “Bedroom” does not include a hallway, bathroom, kitchen, living room, family room, dining room, den, breakfast nook, pantry, laundry room, sunroom, recreation, media/video room, or exercise room.

Inspection for purposes of the application of this section means an onsite review of the subject property by Pinellas County staff for minimum life/safety requirements in accordance with the Florida Building Code and Florida Fire Prevention Code.

Occupancy refers to the number of adults and minors regularly present within the boundary of the property.

Owner means the person or entity holding legal title to the short term rental property, as reflected in the Pinellas County Tax Collector's records.

Responsible party means the owner or agent, 18 years of age or older, tasked with responding to requests for inspections, complaints, and other problems relating to or emanating from the short term rental of the transient public lodging establishment. The responsible party must be authorized to act on behalf of the owner to report issues of trespass to law enforcement in relation to occupancy violations under this Section. There will only be one designated responsible party for each short term rental. An owner may retain a private property management company to serve as the designated responsible party.

Short term rental, short term rental property, and short term vacation rental are terms that may be used interchangeably, have the same meaning, and be defined as a structure

that is a "transient public lodging establishment" as defined herein and in Section 509.013, Florida Statutes, as amended. Should the definition of "transient public lodging establishment" be amended in the Florida Statutes after the effective date of this ordinance, the statutory definition shall govern.

Transient public lodging establishment means any unit, group of units, dwelling, building, or group of buildings within a single complex of buildings which is rented to guests more than three times in a calendar year for periods of less than 30 days or 1 calendar month, whichever is less, or which is advertised or held out to the public as a place regularly rented to guests.

(g) *Mandatory Short Term Rental Certificate of Use.*

- (1) A valid short term rental certificate of use is required for any short term rental unit to be rented or offered for rent in the county. Failure to maintain a current short term rental certificate of use to operate any short term rental unit is a violation of this section. It is recognized there are agreements for short-term vacation rentals in existence at the time of effective date of the ordinance enacting this Division will be considered vested. Should any issue arise as to whether a rental agreement is vested under this subsection, the owner or responsible party shall provide proof of a vested rental agreement to the satisfaction of the County, including providing electronic data that establishes the date on which the agreement at issue was entered into.
- (2) Any person or entity who operates a short term rental unit will apply for a short term rental certificate of use on a form provided by the county and with the required application fee. An applicant will include all information required by this ordinance in the application. The county will review the application for completeness before processing begins. If the application is incomplete, the applicant will be informed of what material is missing. The applicant will have twenty (20) business days to provide the missing material. If the missing material is not provided, the application will be deemed withdrawn. If the missing material is provided and the application is deemed complete, staff will process the application in the usual course of business.
- (3) A short term rental certificate of use will be valid for a one-year period beginning with its issuance date.
- (4) A short term rental certificate of use must be renewed prior to the end of its term by filing an application for renewal sixty (60) days before the expiration of the certificate. An applicant must include all information required by this ordinance in the application. Upon receipt of an incomplete application, the applicant will have twenty (20) business days to provide all missing materials and information. If a complete application is not received within the allotted timeframe, the application will be deemed withdrawn. Once the application is deemed complete, the administration will process the application in the usual course of business. If a renewal application is filed in a timely manner, the current short term rental certificate of use will remain in effect until the application for a renewal certificate is approved or denied. If an

application for a renewal certificate of use is not filed in a timely manner, the short term rental certificate will expire, and the short term rental unit will not be offered for rent or rented.

- (5) A short term rental certificate of use will be issued by the county if the following conditions have been met:
- a. The application for a short term rental certificate of use is complete, and the applicant has submitted all required documents.
 - b. A short term rental unit will be inspected by Pinellas County Staff before the initial issuance of a short term rental certificate of use, and every two years thereafter as part of the renewal process.
 - c. An inspection of the short term rental unit shows that the short term rental unit meets the minimum life/safety requirements per this Section.
 - d. The applicant has paid all required fees and if any fines or penalties had been previously imposed on the applicant, property, or the short term rental unit, the fines and penalties have been paid or otherwise resolved.
- (6) The short term rental certificate of use application must include all information relevant to review and approval of a certificate, including but not limited to, the following information:

Property Owner.

- a. Name.
- b. Address.
- c. Phone (Including the land line or mobile number applicable to the property)
- d. Email address.

Responsible Party.

- e. Name.
- f. Address.
- g. Phone.
- h. Email address.

Short term rental unit address.

- i. Number and street address, including individual unit numbers or letters for short term rental units with more than one unit.
- j. The name of the short term rental property (e.g., “Mermaid’s Hideaway”)

Parking.

- k. A parking plan, to include the number and location of on-site parking spaces, with a drawing of the location of parking spaces if applicable, as attachment.

Proof of ownership. The following proofs must be submitted:

- l. Copy of a recorded deed (as an attachment) or a recent profile from property appraiser (as an attachment).
- m. Verification of active status with Florida Division of Corporations for corporate owners (as an attachment).

Parcel Identification Number (assigned by the county property appraiser).

Property description type.

- n. Single Family
- o. Duplex Unit
- p. Condominium
- q. Other – list type

Occupancy.

- r. Number of bedrooms.
- (7) The property owner or responsible party must submit an application to the county for each short term rental unit attesting to the following:
- a. That the property owner or responsible party has an active license from the Department of Business Professional Regulation (DBPR) for use of the property as a public lodging establishment. A copy of the active license will be submitted as part of the application.
 - b. That the property owner or responsible party collects and remits the required tourist development tax pursuant to Chapter 212, Florida Statutes. The property owner or responsible party will attest to compliance on the application.
 - c. That the short term rental property complies with all ordinances of the county.
- (8) Payment of fees will include a certificate of use fee, a portion of which will be non-refundable to initiate and process an application, inspection fee(s), and an annual renewal fee. Any adjustment to these fees may be made by resolution of the Board of County Commissioners.

- (9) The county has the discretion to request any additional information required to demonstrate compliance with all state laws and county ordinances.
- (10) The county may revise the application requirements by resolution.
- (11) Upon receipt of a complete application, the county will schedule an inspection for compliance with the minimum life/safety requirements per this Section. Once the property has passed the applicable inspection(s), the county will issue a short term rental certificate of use to the property owner which certificate will be valid for a period of one year. If the short term rental property fails its inspection, the owner will be given 30 days to bring the property into compliance with the minimum life/safety requirements per this Section and request a re-inspection of the property. An owner may apply for an extension up to sixty (60) additional days if the owner is able to demonstrate efforts toward compliance. Evidence of efforts towards compliance include but are not limited to completion of a building permit filed and in-review.
- (12) A short term rental certificate of use may not be transferred upon change of ownership.
- a. Certificates of use are non-transferable and non-assignable. The certificate of use when issued will pertain only to the property owner designated on the certificate of use for use at the one (1) specific property identified on the certificate of use.
 - b. A separate certificate of use is required for the same property owner to operate a short term rental at another location.
 - c. A new certificate of use is required if ownership of the short term rental changes from the owner(s) identified on the certificate, including purchase or acquisition of the assets of a legal entity identified as the owner on the certificate of use.
 - d. When a short term rental is sold or ownership is otherwise transferred, the new owner will apply for an initial certificate of use within thirty (30) days from the date of the sale or transfer and will obtain a new initial certificate of use. If the new owner fails to apply for a new certificate of use as provided in this section, any certificate of use previously issued for that short term rental will be null and void on the thirtieth (30) day after such sale or transfer.
 - e. An inspection of the short term rental pursuant to the minimum life/safety requirements per this Section is required whenever a new owner applies for an initial certificate of use due to the sale of a short term rental or a change of ownership not involving a sale.

- (13) Failure to complete the application process including a satisfactory inspection within thirty (30) days after the initial inspection constitutes a violation of this section, and the county will be authorized to deny the application.
- (14) No property owner or responsible party will operate a short term rental unit within the county without a valid short term rental certificate of use. Failure to have a current short term rental certificate will constitute a violation of this section.
- (15) The property owner must notify the Pinellas County Property Appraiser's Office of the intent to rent the property on a short term rental basis to ensure proper treatment of property tax exemptions and valuation.

(h) Standards for Short Term Rentals

- (1) All short term rental units, whether single-family homes, duplexes, condominium units, three- or four-unit complexes, or multiple family complexes, must meet the following minimum life/safety requirements:
 - a. Bedrooms. As defined in 22-319(f);
 - b. Smoke Alarms and Carbon Monoxide Detectors. Meets the requirements of the Florida Building Code and manufacturers specifications;
 - c. Swimming Pool. Meets the requirements of the Residential Swimming Pool Safety Act, Chapter 515, Florida Statutes.
- (2) Maximum Occupancy. Maximum occupancy shall be no more than two persons per bedroom plus two persons in one common area, not to exceed more than ten persons total per unit, whichever is less.
- (3) Noise. Quiet hours are to be observed between 10:00 p.m. and 9:00 a.m. daily or as in accordance with county noise regulations, whichever mandates the most quiet hours.
- (4) Parking. A minimum of one off-street parking space will be provided for every three occupants. The number of parking spaces shall be rounded up to the next whole number. Garage spaces count towards minimum requirement if available to the occupant(s). Front lawn parking does not count towards the minimum requirement.
- (5) Responsible party. Responsible party will be available in a reasonable time, such time being no less than 24 hours, to respond to inspections, emergencies, complaints, or other problems related to the short term rental property. The duties of the short term rental responsible party are to:
 - a. Be available by telephone at the posted phone number to handle any issues arising from the short term rental use;

- b. If necessary, be willing and able to come to the short term rental unit following notification from an occupant, owner, law enforcement, or county official to address issues related to the short term rental;
- c. Inquire prior to check-in through a written question in the short term rental reservation application if any guest of a short term rental is a sexual offender or predator as defined in § 775.21, § 943.0435, § 944.607, or § 985.4815. If any guest of a short term rental responds that he or she is a sexual offender or predator as defined in § 775.21, § 943.0435, § 944.607, or § 985.4815, the short term rental responsible party shall immediately notify the Pinellas County Sheriff's Department;
- d. Be authorized to receive service of any legal notice on behalf of the owner for violations of this section;
- e. Otherwise regularly monitor the short term rental unit to assure compliance with the requirements of this section;
- f. An owner of a short term rental may designate a responsible party to manage the unit on their behalf. The county will provide a form for such purpose which must be completed, notarized, and submitted to the county. The responsible party must accept the designations on a form provided by the county. The designation of a responsible party does not relieve the owner of the responsibility to comply with all the state and local statutes and ordinances;
- g. Any person who accepts a designation to act on behalf of a short term rental property owner and is designated as the responsible party is subject to the same compliance standards and applicable penalties; and
- h. A short term rental property owner can withdraw a responsible party authorization by submitting a new properly executed authorization to the county. The county may rely on the latest form it has of the owner's intent.

(6) Posting short term rental unit information conspicuously on or near the interior side of the front door of the primary entrance, there will be provided on a single page the following information:

- a. The name and phone number of the short term rental responsible party;
- b. The maximum occupancy of the unit, per this section, above;
- c. The maximum number of vehicles that can be parked at the unit, per this section, above; along with a sketch of the location of the off-street parking spaces;

- d. A copy of the Pinellas County Noise Ordinance;
- e. The days of trash pickup and recycling;
- f. The location of the nearest hospital;
- g. Afterhours number to short term rental monitoring hotline; and
- h. The following statement, or substantially similar language: "You are vacationing in a residential area. Please be a good neighbor by keeping the noise to a respectful level during the day and night. Excessive and unreasonable noise can deprive neighbors of the peaceful enjoyment of their private property."

(7) Assembly Uses as otherwise defined in the Pinellas County Code, including uses such as events, weddings, receptions and similar facilities that provide a gathering place for event functions are not permitted without additional review and approval.

(i) Short Term Rental Units Advertisement Requirement

- (1) All advertising for short term rental units will state the occupancy limit of the short term rental unit, the maximum parking available on the property, and will include the following statement:

"You are vacationing in a residential area. Please be a good neighbor by keeping the noise to a respectful level during the day and night. Excessive and unreasonable noise can deprive neighbors of the peaceful enjoyment of their private property."

- (2) All advertising for short term rental units will include the state license number of the short term rental and the county certificate of use number.
- (3) Advertisements that do not contain this information or that contain inaccurate information will be deemed a violation of this section and subject to the penalties contained in this section. The short term rental certificate of use number will be included on all advertising, including, but not limited to print and internet-based advertising. For advertisements published in newspapers, the owner or manager of the short term rental unit may use an abbreviated version of the required advertising information provided that the newspaper ad refers readers to a website and posted notices in the short term rental unit for a more detailed version of rules and regulations of booking a short term rental unit.

(j) Penalties for violations of this article

Violations of this article are punishable as provided in Pinellas County Code of Ordinances Chapter 1, Section 1-8.

SECTION 3. Severability. If any section, subsection, sentence, clause, phrase, or provision of this Ordinance is for any reason held invalid or unconstitutional by any Court of competent jurisdiction, such holding will not be construed to render the remaining provisions of this Ordinance invalid or unconstitutional.

SECTION 4. Inclusion in Code. The provisions of this Ordinance will be included and incorporated in the Pinellas County Code, as an amendment thereto, and will be appropriately renumbered to conform to the uniform numbering system of the Pinellas County Code.

SECTION 5. Filing of Ordinance; Effective Date. Pursuant to Section 125.66, Florida Statutes, a certified copy of this Ordinance will be filed with the Department of State by the Clerk of the Board of County Commissioners within ten (10) days after enactment by the Board of County Commissioners. This Ordinance will become effective upon filing of the ordinance with the Department of State.

APPROVED AS TO FORM
By: Derrill McAteer
Office of the County Attorney

PCAO 527708