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**To:** State Attorney's Office  
2<sup>nd</sup> Judicial Circuit (Leon County)

**From:** Elias Makere, FSA, MAAA  
Civilian

**Date:** November 25, 2025

**Where:** Tallahassee, FL

**What:** Criminal Complaint

**Statute:** §286 FS

**Perpetrator:** The Florida Commission on Human Relations (FCHR)

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**THE FCHR HELD A SECRET MEETING  
(BY FAILING TO PROVIDE PROPER NOTICE)  
THEREBY VIOLATING STATE LAW (§286 FS)**

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The FCHR broke state law yesterday (ie, 11/24/25).

The FCHR did so by holding a **secret meeting** (in contravention of [§286 FS](#); also see [28-102.001\(1\) FAC](#)).<sup>1/</sup>

Statement of the Facts

1. The Florida Commission on Human Relations ("FCHR") is a statewide administrative agency. One which was created by [§760.03 FS](#); and one which operates under Florida's Department of Management Services ([§20.22 FS](#); [§760.04 FS](#))
2. On Monday, November 17, 2025, the FCHR published notice in *the Florida Administrative Register* (hereinafter "[That Notice](#)").
3. That Notice informed the public that the FCHR would be holding a public meeting ("That Meeting"). That Meeting was scheduled to commence on Monday, November 24, 2025.
4. That Notice failed to provide adequate notice of That Meeting.

- a. [Rule 28-102.001\(1\)](#) FAC states that Florida agencies must give "**at least seven days notice**" of a public meeting.

The regulation reads as follows (highlights added):

"(1) *Except where otherwise provided, the agency shall give at least seven days notice of any public meeting, hearing, or workshop by publication in the Florida Administrative Register and on agency's website. Provisions regarding notices of hearings in proceedings for determining substantial interests are found in [Rules 28-106.208](#) and [28-106.302](#), F.A.C.*"

- [Rule 28-102.001\(1\)](#) FAC

- b. Furthermore, [Rule 2.514\(a\)\(1\) Fla. R. Jud. Admin.](#) states that agencies must calculate days by excluding the notification/publish date (ie, Day 0).

i. In other words, agencies must subtract one-day from its timeline calculation.

- c. As such, That Notice only gave the public 6-days notice [of That Meeting].

i.  $6 = 11/24/25 \text{ minus } 11/17/25 \text{ minus } 1$

5. On Monday, November 24, 2025, the FCHR did [indeed] hold That Meeting.

6. At That Meeting, the agency rendered official decisions. Decisions (ie, *voting; policymaking; etc.*) which impact the substantial rights of many Floridians.

a. Please refer to [a recording of the 80-minute meeting](#).

7. In sum, the FCHR took official public action, yet it barred the public from having a *full & fair opportunity* to [even] know about those actions.

#### Mitigating Harm, Preventing Legal Intervention

8. On Monday, November 24, 2025, the Undersigned contacted the FCHR (via email/phone). Thereby asking the agency to

confirm/deny that it never provided adequate notice in any issue of the FAR (§2-§5 *supra*).

9. The FCHR, however, never responded.

10. So - given the FCHR's recidivism<sup>1/</sup> (and current time constraints) - the Undersigned gave the FCHR a deadline of 9:00AM EST on Tuesday, November 25, 2025 (to obey the law).

11. The state agency, however, failed to meet that deadline. Thereby further crystallizing its guilt (and its guilty conscience).

#### Ultimate Facts

12. The bottom line is that the FCHR held a secret meeting. A secret meeting, importantly, in which it conducted the public's business.

#### Legal Application

13. Pursuant to [§286.011\(1\) FS](#), the actions that the FCHR took during its secret meeting are/were ***null & void***.

14. According to that same statute, the State of Florida is **authorized to imprison/fine FCHR officials** (via [§286.011\(3\) FS](#)).

15. When confronted with this reality, the state agency neither:

(a) disputed the facts; nor

(b) agreed to nullify/rectify its unlawful conduct.

Conduct, notably, that the Undersigned has brought to the FCHR's attention on several prior occasions.<sup>1/</sup>

In short, the Florida Commission on Human Relations knowingly violated the public's right (statutory - [§286.011 FS](#); and constitutional - [1st Amendment](#)) to attend a public meeting.

Request

So, may you please:

- (a) gather the necessary evidence;
- (b) charge the FCHR with violating [§286](#);
- (c) punish the FCHR (in accordance with the law); and
- (d) enjoin the FCHR from violating [§286](#) ever again.

Thank You,

/s/

Elias Makere, FSA, MAAA | Floridian | The 'Undersigned'  
Textbook.Discrimination@outlook.com | 904.294.0026

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Endnotes

<sup>1/</sup> Notably, this is [at least] the 5<sup>th</sup> time (within the past 42 months) in which the FCHR has violated this law. This is only the 4<sup>th</sup> time, though, that the Undersigned has filed charges.

Electronic Copy:

[TextBookDiscrimination.com/Files/FCHR/0z Complaint 004 Sunshine.pdf](https://TextBookDiscrimination.com/Files/FCHR/0z%20Complaint%20004%20Sunshine.pdf)

How-To Guide (for posterity):

[TextBookDiscrimination.com/Guides/SecretMeetings](https://TextBookDiscrimination.com/Guides/SecretMeetings)

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**Verification Under Oath Pursuant to §92.525(1)(c)**

Under penalties of perjury, I declare that I have read the foregoing and that the facts stated in it are true to the best of my knowledge and belief.

STATE OF FLORIDA

COUNTY OF DUVAL

/s/

11/25/2025

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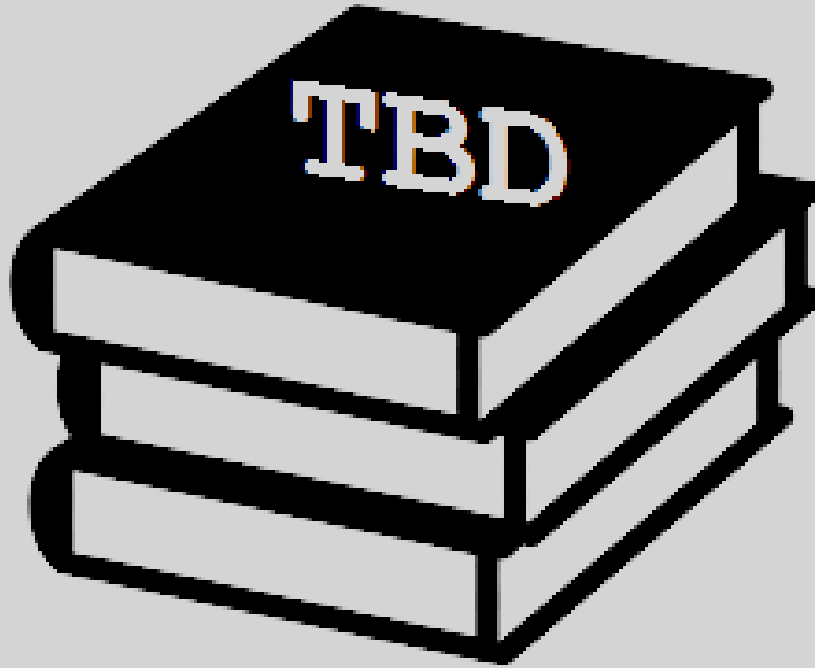
Elias Makere, Complainant

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