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To: State Attorney's Office
2nd Judicial Circuit (Leon County)

From: Elias Makere, FSA, MAAA
Civilian

Date: December 2, 2025

Where: Tallahassee, FL

What: Criminal Complaint

Statute: §286 FS

Perpetrators: The Florida Commission on Human Relations (FCHR)
FCHR Commissioner Chad Bayse;
FCHR Commissioner Vicky Bufano;
FCHR Commissioner Dawn Hanson;
FCHR Commissioner Michael Kessie;
FCHR Commissioner Mark Miller;
FCHR Commissioner Amanda Neff;
FCHR Commissioner Mitchell Toryanski; and
FCHR Commissioner Jose Vicente.

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

The FCHR broke state law today (ie, 12/2/25).

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

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 Tuesday, November 25, 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 Tuesday, December 2, 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.](#) (also see [Rule 28-106.103 FAC](#)) 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 = 12/2/25 minus 11/25/25 minus 1
5. On Tuesday, December 2, 2025, the FCHR did [indeed] hold That Meeting.
6. At That Meeting, the agency rendered official decisions. Decisions (ie, *installing an agency head*) which impact the substantial rights of many Floridians.
 - a. Please refer to [this recording of the 18-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, December 1, 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^{1/} (and current time constraints) - the undersigned gave the FCHR a deadline of 9:00AM EST on Tuesday, December 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](#)).
 - a. Those public officials include - but are not limited to:
 - i. FCHR Commissioner Chad Bayse;
 - ii. FCHR Commissioner Vicky Bufano;
 - iii. FCHR Commissioner Dawn Hanson;
 - iv. FCHR Commissioner Michael Kessie;
 - v. FCHR Commissioner Mark Miller;
 - vi. FCHR Commissioner Amanda Neff;
 - vii. FCHR Commissioner Mitchell Toryanski; and

viii. FCHR Commissioner Jose Vicente.

b. Only one commissioner, notably, chose to respect the law (by absenting the FCHR's secret meeting). That commissioner was Mr. Jose Tapia.

i. The Undersigned hereby asks the State Attorney to disassociate Mr. Tapia from the illegalities of his counterparts.

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.^{1/} Violative conduct, pertinently, that every [attending] commissioner had full knowledge of (as evidenced by [\[audio-recorded admissions\]](#) - by Commission Chair Mark Miller).

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);
- (d) **punish** the aforementioned 8 commissioners;
- (e) **nullify** all acts from the FCHR's [12/2/25] meeting; and
- (f) **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

Endnotes

^{1/} Notably, this is [at least] the 6th time (within the past 42 months) in which the FCHR has violated this law. This is only the 5th time, though, that the Undersigned has filed charges. In fact, this is the 2nd time the undersigned has had to do so this quarter (see [the Undersigned's 11/25/25 Criminal Complaint against the FCHR](#)).

Electronic Copy:

[TextBookDiscrimination.com/Files/FCHR/1a Complaint 005 Sunshine.pdf](https://TextBookDiscrimination.com/Files/FCHR/1a%20Complaint%20005%20Sunshine.pdf)

How-To Guide (for posterity):

TextBookDiscrimination.com/Guides/SecretMeetings

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/ 12/2/2025

Elias Makere, Complainant

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