

**APPLICATION FOR NOMINATION TO THE SEVENTH JUDICIAL CIRCUIT
COURT**

Full Name: Christopher Robert Ditslear

Social Security No [REDACTED]

Florida Bar No.: 87335

Date Admitted to Practice in Florida: 9/24/1996

1. Please state your current employer and title, including any professional position and any public or judicial office you hold, your business address and telephone number.

Self Employed, Law Office of Christopher R. Ditslear
129 ½ North Woodland Blvd., Suite 5
DeLand, Florida 32720

2. Please state your current residential address, including city, county, and zip code. Indicate how long you have resided at this location and how long you have lived in Florida. Additionally, please provide a telephone number where you can be reached (preferably a cell phone number), and your preferred email address.

435 North Sans Souci Avenue
DeLand, Volusia County, Florida 32720
Resided at this location for seven years. Resided in Florida for thirty-one years.
Cell number- (386) 801-0244
Email- ditslearlaw@gmail.com

3. State your birthdate and place of birth.

November 29, 1970
Madison County, Indiana

4. Are you a registered voter in Florida (Y/N)?

Yes

5. Please list all courts (including state bar admissions) and administrative bodies having special admissions requirements to which you have ever been admitted to practice, giving the dates of admission, and if applicable, state whether you have ever been suspended or resigned. Please explain the reason for any lapse in membership.

-The Florida Bar, admitted September 24, 1996 to present

-United States District Court, Middle District of Florida 1996-1997

I permitted this membership to lapse as I was not practicing in federal court.

6. Have you ever been known by any aliases? If so, please indicate and when you were known by such alias.

No.

EDUCATION:

7. List in reverse chronological order each secondary school, college, university, law school or any other institution of higher education attended and indicate for each the dates of attendance, whether a degree was received, the date the degree was received, class standing, and graduating GPA (if your class standing or graduating GPA is unknown, please request the same from such school).

Stetson University College of Law, 1993 to 1996, Received Juris Doctorate degree in May 1996, class standing was 5th, graduating GPA was 3.8:

West Virginia University, 1989 to 1993, Received Bachelor of Arts degree in May 1993, class standing is unknown but will be requested, graduating GPA is believed to be 3.35 (will be requested for verification.)

Loudoun County High School, Leesburg Virginia, 1985 to 1989, received a high school diploma, class standing is unknown but will be requested, graduating GPA is believed to be 3.25 (will be requested for verification.)

8. List and describe any organizations, clubs, fraternities or sororities, and extracurricular activities you engaged in during your higher education. For each, list any positions or titles you held and the dates of participation.

Theta Chi fraternity, West Virginia University 1990 to 1993. Pledge instructor.

EMPLOYMENT:

9. List in reverse chronological order all full-time jobs or employment (including internships and clerkships) you have held since the age of 21. Include the name and address of the employer, job title(s) and dates of employment. For non-legal employment, please briefly describe the position and provide a business address and telephone number.

Attorney/Sole Proprietor- Law Office of Christopher R. Ditslear, 129 ½ North Woodland Blvd., Suite 5, DeLand, Florida 32720 from September 11, 2001 to present;

Associate Attorney- Law Office of Robert Foster, 108 West Rich Avenue, DeLand, Florida 32720 from September 24, 1996 to September 10, 2001;

Law Clerk- Piper, Esteva, Green, Karvonen and Lewis, 3637 4th Street North, St. Petersburg, Florida 33704 from 1995 to May 1996;

Glen Abbey Golf Club, 391 North Pine Meadow Drive, DeBary, Florida 32713, Bartender during the summer of 1993;

Lakeview Golf Resort and Spa, 1 Lakeview Drive, Morgantown, West Virginia 26508, Kitchen manager during the summer of 1992.

10. Describe the general nature of your current practice including any certifications which you possess; additionally, if your practice is substantially different from your prior practice or if you are not now practicing law, give details of prior practice. Describe your typical clients or former clients and the problems for which they sought your services.

Solo practice family law attorney. My typical clients are individuals seeking representation in dissolution of marriage actions, paternity actions, modifications of existing family law judgments, child support proceedings and adoptions.

11. What percentage of your appearance in court in the last five years or in the last five years of practice (include the dates) was:

	Court		Area of Practice	
Federal Appellate	_____ %	Civil		5 %
Federal Trial	_____ %	Criminal		5%
Federal Other	_____ %	Family		90 %
State Appellate	_____ %	Probate		_____ %
State Trial	100%	Other		_____ %
State Administrative	_____ %			
State Other	_____ %			
TOTAL	_____ 100 %	TOTAL		_____ 100 %

If your appearance in court the last five years is substantially different from your prior practice, please provide a brief explanation:

12. In your lifetime, how many (number) of the cases that you tried to verdict, judgment, or final decision were:

Jury?	15+	Non-jury?	Unknown.	Hundreds
Arbitration?	1	Administrative Bodies?	0	
Appellate?	20			

13. Please list every case that you have argued (or substantially participated) in front of the United States Supreme Court, a United States Circuit Court, the Florida Supreme Court, or a Florida District Court of Appeal, providing the case name, jurisdiction, case number, date of argument, and the name(s), e-mail address(es), and telephone number(s) for opposing appellate counsel. If there is a published opinion, please also include that citation.

Kenneth Dean vs. Diana Dean, Florida Fifth District Court of Appeal,
Case No. 5D-00-3035, Date of argument- Spring of 2001; Opposing counsel was
Lawrence Nixon, now deceased and Robert A. Sanders, Jr., rsanders@circuit7.org.

14. Within the last ten years, have you ever been formally reprimanded, sanctioned, demoted, disciplined, placed on probation, suspended, or terminated by an employer or tribunal before which you have appeared? If so, please state the circumstances under which such action was taken, the date(s) such action was taken, the name(s) of any persons who took such action, and the background and resolution of such action.

No.

15. In the last ten years, have you failed to meet any deadline imposed by court order or received notice that you have not complied with substantive requirements of any business or contractual arrangement? If so, please explain full.

No.

16. For your last six cases, which were tried to verdict or handled on appeal, either before a jury, judge, appellate panel, arbitration panel or any other administrative hearing officer, list the names, e-mail addresses, and telephone numbers of the trial/appellate counsel on all sides and court case numbers (include appellate cases). *This question is optional for sitting judges who have served five years or more.*

-Danielle Downer, Esq., Danielle@delandlegal.com, (386) 873-7835, Volusia County Case 2015-10547-FMDL

-David W. Veliz, Esq. velizkatz@velizkatzlaw.com, (407) 849-7072, Volusia County Case 2015-12960-FMDL

-Cheyenne Dunn, Esq. cdunn@bowenschroth.com, (352) 589-1414, Volusia County Case 2017-12818-FMDL

-Camille Martin, Esq. camille@martinlaw.org, (386) 597-9904, Volusia County Case 2017-10851-FMDL

-Danielle Downer, Esq., Danielle@delandlegal.com, (386) 873-7835, Volusia County Case 2018-13284-FMDL;

-Philip Bonamo, Esq., pbonamo@riceclawflorida.com (386) 257-1222, Volusia County Case 2023-10005-FMDL

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17. For your last six cases, which were either settled in mediation or settled without mediation or trial, list the names and telephone numbers of trial counsel on all sides and court case numbers (include appellate cases). *This question is optional for sitting judges who have served five years or more.*

-My last six settled cases were all with self-represented litigants.

18. During the last five years, on average, how many times per month have you appeared in Court or at administrative hearings? If during any period you have appeared in court with greater frequency than during the last five years, indicate the period during which you appeared with greater frequency and succinctly explain.

-On average, I appear in court 20 times per month.

19. If Questions 16, 17, and 18 do not apply to your practice, please list your last six major transactions or other legal matters that were resolved, listing the names, e-mail addresses, and telephone numbers of the other party counsel.

NA

20. During the last five years, if your practice was greater than 50% personal injury, workers' compensation or professional malpractice, what percentage of your work was in representation of plaintiffs or defendants?

NA

21. List and describe the five most significant cases which you personally litigated giving the case style, number, court and judge, the date of the case, the names, e-mail addresses, and telephone numbers of the other attorneys involved, and citation to reported decisions, if any. Identify your client and describe the nature of your participation in the case and the reason you believe it to be significant.

In RE: The Marriage of Antonsen vs. Soto-Bladino, 2014-13649-FMDL, Seventh Circuit, Volusia County, Hon. Dawn Nichols. The case was pending in 2014. I represented the wife in this dissolution of marriage action which involved a staggering amount of assets and a vast disparity in wealth between the parties. My client was the financial underdog. The case was significant not only for the enormity of the assets involved, but also for significant questions of international law regarding pre-nuptial agreements. Opposing counsel was Donald B. Dempsey, Jr., Esq., 120 East Rich Avenue, DeLand, Florida 32724, donalddbempsey@hotmail.com, (386) 738-1159 and Martin Pedata, Esq., 120 East Rich Avenue, DeLand, Florida 32724, topfighter@me.com, (386) 748-0941.

State of Florida vs. Jose Elias Ruiz, 2005-00090-CFAWS, Seventh Circuit, Volusia County, Hon. S. James Foxman. The case was pending in 2005. I was counsel for one of four co-defendants charged with murder. The case presented significant issues regarding the accuracy of Spanish to English interpretation of confessions as well as a whether or not the actions of the defendants caused the death of the victim. The other attorneys involved were Raul Zambrano, [REDACTED] J. Peyton Quarles, Esq., 125 Basin Street, Suite 215, Daytona Beach, Florida 32115, peytonquarles@gmail.com, (386) 255-0305; Thomas Mott, Esq., P.O. Box 2055, Daytona Beach, Florida 32115, thomasrmott@bellsouth.net, (386) 257-2400; Fernando Iglesias, Esq., 120 South Woodland Blvd., Suite 205, DeLand, Florida 32720, iglesiasquire@yahoo.com, (386) 860-1140 and Colleen Taylor, Esq., [REDACTED] taylorc@hotmai.com, [REDACTED]

In RE: The Adoption of C.K., 2018-10341-FMDL, Seventh Circuit, Volusia County, Hon. Karen Foxman. The case was pending in 2018 and 2019. I was counsel for the biological father of a child whose parental rights were usurped by fraudulent collusion between the birth mother and the adoptive parents of the child wherein the birth mother and adoptive father caused the adoptive father's name to be on the child's birth certificate as the biological father. The adoptive father and his spouse, in collusion with the birth mother, instituted a step-parent adoption of the minor child. The case was significant because it raised significant and novel legal issues regarding the post judgment fallibility of adoption decrees. It was also significant with regard to the sheer amount of emotional investment of all the litigants, as well as their extended families. Opposing counsel was

Georgina Roman-Secor, 2290 South Volusia Avenue, Suite D, Orange City, Florida 32763. romansecor@gmail.com. (386) 775-7600.

Price vs. Price, 2014-13580-FMDL, Seventh Circuit, Volusia County. Hon. Dawn Nichols. The case took place between 2014 and early 2016. I represented a spouse in this hotly contested dissolution of marriage action. The case had no specific legal significance, but it posed certain challenges that required unique solutions from both attorneys involved as well as the presiding judge in order to resolve the case. The parties had a large amount of agricultural land in north-west Volusia County. Neither could read nor write. The primary assets were the land, various agricultural equipment, and a herd of cattle. In order to resolve the case, opposing counsel and I had to determine an equitable way to partition the real estate in kind and oversee the division of a herd of cattle. Once that had been accomplished, the major issue left for trial was the division of the agricultural equipment. In order to facilitate this, photographs were taken of all of the equipment and with the assistance of Judge Nichols, the trial consisted of holding up the photos for the parties and each essentially getting rotating "first dibs" or passing on each individual piece of equipment. The case stretched my problem-solving skills while being certain to stay within the parameters of the divorce statutes. It included numerous "field trips" by opposing counsel and me to Seville, Florida. It's a case I will always fondly remember. I imagine that it was similar to the practice of law in Volusia County in the late nineteenth century. Opposing counsel was Michael S. Teal, Esq., 333 East New York Avenue, DeLand, Florida 32724. mteal@mstealpa.com. (386) 738-3400.

State of Florida vs. "Defendant Q"- Jackson Chestnut, 2003-34814-CFAES, Seventh Circuit, Volusia County, Hon. Michael Hutcheson. The case occurred in 2003 and 2004. I represented one of numerous defendants in a statewide, multi-jurisdictional investigation and subsequent prosecution of a commercial chemical company that was allegedly offering bribes to public procurement officials. My client was a purchasing agent for a state correctional facility. The case was significant due to the massive investigation and statement nature of the litigation. It was a highly publicized case. The case was significant to me due to the extraordinary effort and time I committed to the matter. Opposing counsel was Richard B. Bogle, Esq. [REDACTED]

[REDACTED] rybogle@earthlink.net [REDACTED]

22. Attach at least two, but no more than three, examples of legal writing which you personally wrote. If you have not personally written any legal documents recently, you may attach a writing sample for which you had substantial responsibility. Please describe your degree of involvement in preparing the writing you attached.

Attached. I was solely responsible for preparation of the documents.

PRIOR JUDICIAL EXPERIENCE OR PUBLIC OFFICE

23. Have you ever held judicial office or been a candidate for judicial office? If so, state the court(s) involved, the dates of service or dates of candidacy, and any election results.

No.

24. If you have previously submitted a questionnaire or application to this or any other judicial nominating commission, please give the name(s) of the commission, the approximate date(s) of each submission, and indicate if your name was certified to the Governor's Office for consideration.

-Seventh Circuit JNC, August 2017. I was not certified to the Governor's office.

-I have submitted several prior applications to the Seventh Circuit JNC. I do not recall the dates. I was not certified to the Governor's office.

25. List any prior quasi-judicial service, including the agency or entity, dates of service, position(s) held, and a brief description of the issues you heard.

None.

26. If you have prior judicial or quasi-judicial experience, please list the following information:

- (i) the names, phone numbers and addresses of six attorneys who appeared before you on matters of substance;
- (ii) the approximate number and nature of the cases you handled during your tenure;
- (iii) the citations of any published opinions; and
- (iv) descriptions of the five most significant cases you have tried or heard, identifying the citation or style, attorneys involved, dates of the case, and the reason you believe these cases to be significant.

NA

27. Provide citations and a brief summary of all of your orders or opinions where your decision was reversed by a reviewing court or where your judgment was affirmed with significant criticism of your substantive or procedural rulings. If any of the opinions listed were not officially reported, attach copies of the opinions.

NA

28. Provide citations for significant opinions on federal or state constitutional issues, together with the citation to appellate court rulings on such opinions. If any of the opinions listed were not officially reported, attach copies of the opinions.

NA

29. Has a complaint about you ever been made to the Judicial Qualifications Commission? If so, give the date, describe the complaint, whether or not there was a finding of probable cause, whether or not you have appeared before the Commission, and its resolution.

NA

30. Have you ever held an attorney in contempt? If so, for each instance state the name of the attorney, case style for the matter in question, approximate date and describe the circumstances.

NA

31. Have you ever held or been a candidate for any other public office? If so, state the office, location, dates of service or candidacy, and any election results.

Yes. City of DeLand City Commission candidate, 2003. I made it through the primary, but lost in the general election.

NON-LEGAL BUSINESS INVOLVEMENT

32. If you are now an officer, director, or otherwise engaged in the management of any business enterprise, state the name of such enterprise, the nature of the business, the nature of your duties, and whether you intend to resign such position immediately upon your appointment or election to judicial office.

NA

33. Since being admitted to the Bar, have you ever engaged in any occupation, business or profession other than the practice of law? If so, explain and provide dates. If you received any compensation of any kind outside the practice of law during this time, please list the amount of compensation received.

No.

POSSIBLE BIAS OR PREJUDICE

34. The Commission is interested in knowing if there are certain types of cases, groups of entities, or extended relationships or associations which would limit the cases for which you could sit as the presiding judge. Please list all types or classifications of cases or litigants for which you, as a general proposition, believe it would be difficult for you to sit as the presiding judge. Indicate the

reason for each situation as to why you believe you might be in conflict. If you have prior judicial experience, describe the types of cases from which you have recused yourself.

None.

PROFESSIONAL ACCOMPLISHMENTS AND OTHER ACTIVITIES

35. List the titles, publishers, and dates of any books, articles, reports, letters to the editor, editorial pieces, or other published materials you have written or edited, including materials published only on the Internet. Attach a copy of each listed or provide a URL at which a copy can be accessed.

None.

36. List any reports, memoranda or policy statements you prepared or contributed to the preparation of on behalf of any bar association, committee, conference, or organization of which you were or are a member. Provide the name of the entity, the date published, and a summary of the document. To the extent you have the document, please attach a copy or provide a URL at which a copy can be accessed.

None.

37. List any speeches or talks you have delivered, including commencement speeches, remarks, interviews, lectures, panel discussions, conferences, political speeches, and question-and-answer sessions. Include the date and place they were delivered, the sponsor of the presentation, and a summary of the presentation. If there are any readily available press reports, a transcript or recording, please attach a copy or provide a URL at which a copy can be accessed.

I presented a family law ethics presentation at a meeting sponsored by the Dunn Blount Inns of Court together with Hon. Dawn Nichols and attorney Brett Kocijan in the Fall of 2019 at LPGA International. The presentation was a reenactment of attorney-client situations which pose specific ethical issues in the practice of marital and family law. No transcripts or recordings were made.

38. Have you ever taught a course at an institution of higher education or a bar association? If so, provide the course title, a description of the course subject matter, the institution at which you taught, and the dates of teaching. If you have a syllabus for each course, please provide.

No.

39. List any fellowships, honorary degrees, academic or professional honors, honorary society memberships, military awards, and any other special recognition for outstanding service or achievement. Include the date received and the presenting entity or organization.

NA.

40. Do you have a Martindale-Hubbell rating? If so, what is it and when was it earned?

No.

41. List all bar associations, legal, and judicial-related committees of which you are or have been a member. For each, please provide dates of membership or participation. Also, for each indicate any office you have held and the dates of office.

Dunn Blount Inns of Court 2018-2019.

42. List all professional, business, fraternal, scholarly, civic, charitable, or other organizations, other than those listed in the previous question to which you belong, or to which you have belonged since graduating law school. For each, please provide dates of membership or participation and indicate any office you have held and the dates of office.

None.

43. Do you now or have you ever belonged to a club or organization that in practice or policy restricts (or restricted during the time of your membership) its membership on the basis of race, religion (other than a church, synagogue, mosque or other religious institution), national origin, or sex (other than an educational institution, fraternity or sorority)? If so, state the name and nature of the club(s) or organization(s), relevant policies and practices and whether you intend to continue as a member if you are selected to serve on the bench.

No.

44. Please describe any significant pro bono legal work you have done in the past 10 years, giving dates of service.

I have provided routine pro bono services throughout my career, but nothing that I would deem "significant."

45. Please describe any hobbies or other vocational interests.

I am an avid golfer.

46. Please state whether you have served or currently serve in the military, including your dates of service, branch, highest rank, and type of discharge.

No military service.

47. Please provide links to all social media and blog accounts you currently maintain, including, but not limited to, Facebook, Twitter, LinkedIn, and Instagram.

facebook.com/chrisditslear
Instagram.com/chrisditslear

FAMILY BACKGROUND

48. Please state your current marital status. If you are currently married, please list your spouse's name, current occupation, including employer, and the date of the marriage. If you have ever been divorced, please state for each former spouse their name, current address, current telephone number, the date and place of the divorce and court and case number information.

Married to Jennifer Ditslear on October 3, 1998. She is the Volusia County Assistant Director of Purchasing and Contracts. Employed by County of Volusia. I have never been divorced.

49. If you have children, please list their names and ages. If your children are over 18 years of age, please list their current occupation, residential address, and a current telephone number.

Zane Ditslear, 22 years of age. Full time student and district manager for ASR Pizza, Inc. Residence address- 100 Integra Dunes Drive, DeLand, Florida 32724. Tel. (386) 846-5223;

Zachary Ditslear, 22 years of age. Corporal, United States Marine Corps. Residence address- 8th Engineer Support Battalion, PSC 20131, Camp Lejeune, North Carolina, 28542-0131. Tel. (386) 344-9175
PSC BOX 20131
Camp Lejeune, NC 28542-0131

CRIMINAL AND MISCELLANEOUS ACTIONS

50. Have you ever been convicted of a felony or misdemeanor, including adjudications of guilt withheld? If so, please list and provide the charges, case style, date of conviction, and terms of any sentence imposed, including whether you have completed those terms.

No.

51. Have you ever pled nolo contendere or guilty to a crime which is a felony or misdemeanor, including adjudications of guilt withheld? If so, please list and provide the charges, case style, date of conviction, and terms of any sentence imposed, including whether you have completed those terms.

No.

52. Have you ever been arrested, regardless of whether charges were filed? If so, please list and provide sufficient details surrounding the arrest, the approximate date and jurisdiction.

No.

53. Have you ever been a party to a lawsuit, either as the plaintiff, defendant, petitioner, or respondent? If so, please supply the case style, jurisdiction/county in which the lawsuit was filed, case number, your status in the case, and describe the nature and disposition of the matter.

Yes

Jeffrey Parsons vs. Christopher Ditslear, Volusia County Case 2017-10703-FMDL. I was the Respondent. The case was for an injunction for protection. It was dismissed by the Court without a hearing on the face of the petition. I was not served, so, technically, not a party.

Kerr and Associates, Inc. vs. Christopher Ditslear, Lake County Case 2006-SC-2521. I was the defendant in a small claims action to recover court reporter fees that my client failed to pay to the court reporter. The case was voluntarily dismissed by the Plaintiff.

54. To your knowledge, has there ever been a complaint made or filed alleging malpractice as a result of action or inaction on your part?

No.

55. To the extent you are aware, have you or your professional liability carrier ever settled a claim against you for professional malpractice? If so, give particulars, including the name of the client(s), approximate dates, nature of the claims, the disposition and any amounts involved.

No.

56. Has there ever been a finding of probable cause or other citation issued against you or are you presently under investigation for a breach of ethics or unprofessional conduct by any court, administrative agency, bar association, or other professional group. If so, provide the particulars of each finding or investigation.

No.

57. To your knowledge, within the last ten years, have any of your current or former co-workers, subordinates, supervisors, customers, clients, or the like, ever filed a formal complaint or

accusation of misconduct including, but not limited to, any allegations involving sexual harassment, creating a hostile work environment or conditions, or discriminatory behavior against you with any regulatory or investigatory agency or with your employer? If so, please state the date of complaint or accusation, specifics surrounding the complaint or accusation, and the resolution or disposition.

Yes. In July 2016 I was the subject of a Florida Bar complaint initiated by an individual that I was involved in a personal relationship with. It was alleged that she was a client and that I was romantically engaged with her. After sending the The Florida Bar my response, the matter was closed without incident or sanction.

58. Are you currently the subject of an investigation which could result in civil, administrative, or criminal action against you? If yes, please state the nature of the investigation, the agency conducting the investigation, and the expected completion date of the investigation.

No.

59. Have you ever filed a personal petition in bankruptcy or has a petition in bankruptcy been filed against you, this includes any corporation or business entity that you were involved with? If so, please provide the case style, case number, approximate date of disposition, and any relevant details surrounding the bankruptcy.

No.

60. In the past ten years, have you been subject to or threatened with eviction proceedings? If yes, please explain.

No.

61. Please explain whether you have complied with all legally required tax return filings. To the extent you have ever had to pay a tax penalty or a tax lien was filed against you, please explain giving the date, the amounts, disposition, and current status.

I have complied with all required tax return filings. I have had to pay a small penalty or interest amount in the past for under-estimated quarterly payments.

HEALTH

62. Are you currently addicted to or dependent upon the use of narcotics, drugs, or alcohol?

No.

63. During the last ten years have you been hospitalized or have you consulted a professional or have you received treatment or a diagnosis from a professional for any of the following: Kleptomania,

Pathological or Compulsive Gambling, Pedophilia, Exhibitionism or Voyeurism? If your answer is yes, please direct each such professional, hospital and other facility to furnish the Chairperson of the Commission any information the Commission may request with respect to any such hospitalization, consultation, treatment or diagnosis. ["Professional" includes a Physician, Psychiatrist, Psychologist, Psychotherapist or Mental Health Counselor.] Please describe such treatment or diagnosis.

No.

64. In the past ten years have any of the following occurred to you which would interfere with your ability to work in a competent and professional manner: experiencing periods of no sleep for two or three nights, experiencing periods of hyperactivity, spending money profusely with extremely poor judgment, suffering from extreme loss of appetite, issuing checks without sufficient funds, defaulting on a loan, experiencing frequent mood swings, uncontrollable tiredness, falling asleep without warning in the middle of an activity. If yes, please explain.

No.

65. Do you currently have a physical or mental impairment which in any way limits your ability or fitness to properly exercise your duties as a member of the Judiciary in a competent and professional manner? If yes please explain the limitation or impairment and any treatment, program or counseling sought or prescribed.

No.

66. During the last ten years, have you ever been declared legally incompetent or have you or your property been placed under any guardianship, conservatorship or committee? If yes, provide full details as to court, date, and circumstances.

No.

67. During the last ten years, have you unlawfully used controlled substances, narcotic drugs, or dangerous drugs as defined by Federal or State laws? If your answer is "Yes," explain in detail. (Unlawful use includes the use of one or more drugs and/or the unlawful possession or distribution of drugs. It does not include the use of drugs taken under supervision of a licensed health care professional or other uses authorized by Federal or State law provisions.)

No.

68. In the past ten years, have you ever been reprimanded, demoted, disciplined, placed on probation, suspended, cautioned, or terminated by an employer as result of your alleged consumption of alcohol, prescription drugs, or illegal drugs? If so, please state the circumstances

under which such action was taken, the name(s) of any persons who took such action, and the background and resolution of such action.

No.

69. Have you ever refused to submit to a test to determine whether you had consumed and/or were under the influence of alcohol or drugs? If so, please state the date you were requested to submit to such a test, the type of test required, the name of the entity requesting that you submit to the test, the outcome of your refusal, and the reason why you refused to submit to such a test.

No.

70. In the past ten years, have you suffered memory loss or impaired judgment for any reason? If so, please explain in full.

No.

SUPPLEMENTAL INFORMATION

71. Describe any additional education or experiences you have which could assist you in holding judicial office.

I have been self-employed in the private practice of law for over 23 years and, on average, appear in court twenty times a month. This has given me a firm grasp of trial practice and procedure, the evidence code and courtroom protocols. The self employment aspect of this has taught me not only how to practice law, but also how to manage a successful business including budgeting, payroll and office management.

72. Explain the particular contribution you believe your selection would bring to this position and provide any additional information you feel would be helpful to the Commission and Governor in evaluating your application.

I am a very vested member of my community and have taken an active role in the betterment of the same. This includes participating in charity and community events, coaching youth sports and lending advice and perspectives to local officials when requested. I would hope this demonstrates my heartfelt desire to serve the community, the Seventh Circuit and the State Florida in a judicial capacity.

REFERENCES

73. List the names, addresses, e-mail addresses and telephone numbers of ten persons who are in a position to comment on your qualifications for a judicial position and of whom inquiry may be made by the Commission and the Governor.

Michael S. Teal, Esq., 333 East New York Avenue, DeLand, Florida 32724.
mteal@mstealpa.com. (386) 738-3400.

Hon Dawn Nichols, 101 North Alabama Avenue, DeLand, Florida 32724.
dnichols@circuit7.org. (386) 822-5744.

Hon. James R. Clayton, 101 North Alabama Avenue, DeLand, Florida 32724.
jclayton@circuit7.org. [REDACTED]

Hon. Matthew Foxman, 101 North Alabama Avenue, DeLand, Florida 32724.
mfoxman@circuit7.org. (386) 626-6590.

Hon. Karen Foxman, 251 North Ridgewood Avenue, Daytona Beach, Florida 32114.
kfoxman@circuit7.org. (386) 239-7793.

John V. Doyle, [REDACTED]

jdoyle409@gmail.com. [REDACTED]

Tammy L. Jaques, Esq., 129 ½ North Woodland Blvd., Suite 5, DeLand, Florida 32720.
tj@volusiadefender.com. (386) 507-2034.

Kenneth Goldberg, 538 Cygnet Lane, DeLand, Florida 32724.
kenbo@gbergconstruction.com. (386) 804-3732.

Michael C. Huddleston, Esq. 817 West New York Avenue, DeLand, Florida 32720.
huddlestonlaw@outlook.com. (386) 738-0080.

Kristi Welsh, [REDACTED]

kwelsh@veso.us. [REDACTED]

CERTIFICATE

I have read the foregoing questions carefully and have answered them truthfully, fully and completely. I hereby waive notice by and authorize The Florida Bar or any of its committees, educational and other institutions, the Judicial Qualifications Commission, the Florida Board of Bar Examiners or any judicial or professional disciplinary or supervisory body or commission, any references furnished by me, employers, business and professional associates, all governmental agencies and instrumentalities and all consumer and credit reporting agencies to release to the respective Judicial Nominating Commission and Office of the Governor any information, files, records or credit reports requested by the commission in connection with any consideration of me as possible nominee for appointment to judicial office. Information relating to any Florida Bar disciplinary proceedings is to be made available in accordance with Rule 3-7.1(l), Rules Regulating The Florida Bar. I recognize and agree that, pursuant to the Florida Constitution and the Uniform Rules of this commission, the contents of this questionnaire and other information received from or concerning me, and all interviews and proceedings of the commission, except for deliberations by the commission, shall be open to the public.

Further, I stipulate I have read and understand the requirements of the Florida Code of Judicial Conduct.

Dated this 20 day of March, 2024.

Christopher R. Ditsler

Printed Name



Signature

(Pursuant to Section 119.071(4)(d)(1), F.S.), . . . The home addresses and telephone numbers of justices of the Supreme Court, district court of appeal judges, circuit court judges, and county court judges; the home addresses, telephone numbers, and places of employment of the spouses and children of justices and judges; and the names and locations of schools and day care facilities attended by the children of justices and judges are exempt from the provisions of subsection (1), dealing with public records.

FINANCIAL HISTORY

1. State the amount of gross income you have earned, or losses you have incurred (before deducting expenses and taxes) from the practice of law for the preceding three-year period. This income figure should be stated on a year to year basis and include year to date information, and salary, if the nature of your employment is in a legal field.

Current Year-To-Date: \$61,166.67

Last Three Years:

2023- \$238,920.33

2022- \$230,550.90

2021- \$204,332.35

2. State the amount of net income you have earned, or losses you have incurred (after deducting expenses but not taxes) from the practice of law for the preceding three-year period. This income figure should be stated on a year to year basis and include year to date information, and salary, if the nature of your employment is in a legal field.

Current Year-To-Date: \$54,882.64

Last Three Years:

2023- \$188,588.34

2022- \$181,524.76

2021- \$159,676.08

3. State the gross amount of income or losses incurred (before deducting expenses or taxes) you have earned in the preceding three years on a year by year basis from all sources other than the practice of law, and generally describe the source of such income or losses.

Current Year-To-Date: None.

Last Three Years: None.

4. State the amount you have earned in the preceding three years on a year by year basis from all sources other than the practice of law, and generally describe the source of such income or losses.

Current Year-To-Date: None.

Last Three Years: None.

5. State the amount of net income you have earned or losses incurred (after deducting expenses) from all sources other than the practice of law for the preceding three-year period on a year by year basis, and generally describe the sources of such income or losses.

Current Year-To-Date: None.

Last Three Years: None.

**FORM 6
FULL AND PUBLIC
DISCLOSURE OF
FINANCIAL INTEREST**

PART A – NET WORTH

Please enter the value of your net worth as of December 31 or a more current date. [Note: Net worth is not calculated by subtracting your *reported* liabilities from your *reported* assets, so please see the instructions on page 3.]

My net worth as of March 20, 2024 was \$341,902.00

PART B - ASSETS

HOUSEHOLD GOODS AND PERSONAL EFFECTS:

Household goods and personal effects may be reported in a lump sum if their aggregate value exceeds \$1,000. This category includes any of the following, if not held for investment purposes; jewelry; collections of stamps, guns, and numismatic items; art objects; household equipment and furnishings; clothing; other household items; and vehicles for personal use.

The aggregate value of my household goods and personal effects (described above) is \$ _____

ASSETS INDIVIDUALLY VALUED AT OVER \$1,000:

DESCRIPTION OF ASSET (specific description is required – see instructions p. 3)	VALUE OF ASSET
435 North Sans Souci Avenue, DeLand, Florida 32720	\$420,000.00
Wells Fargo checking	\$58,649.00
2016 Mercedes Benz	\$17,950.00
2008 Four Winds Motorhome	\$15,000.00
2010 Mitzi Skiff	\$12,000.00

PART C - LIABILITIES

LIABILITIES IN EXCESS OF \$1,000 (See instructions on page 4):

NAME AND ADDRESS OF CREDITOR	AMOUNT OF LIABILITY
Pennymac Loan Services	\$181,697.00

JOINT AND SEVERAL LIABILITIES NOT REPORTED ABOVE:

NAME AND ADDRESS OF CREDITOR	AMOUNT OF LIABILITY

PART D - INCOME

You may **EITHER** (1) file a complete copy of your latest federal income tax return, including all W2's, schedules, and attachments, **OR** (2) file a sworn statement identifying each separate source and amount of income which exceeds \$1,000 including secondary sources of income, by completing the remainder of Part D, below.

I elect to file a copy of my latest federal income tax return and all W2's, schedules, and attachments.
 (if you check this box and attach a copy of your latest tax return, you need not complete the remainder of Part D.)

PRIMARY SOURCE OF INCOME (See instructions on page 5):

NAME OF SOURCE OF INCOME EXCEEDING \$1,000	ADDRESS OF SOURCE OF INCOME	AMOUNT
Self Employment- Practice of Law	129 1/2 N. Woodland Blvd., Ste. 5, Del. and, FL 32720	2023- \$188,588.34

SECONDARY SOURCES OF INCOME [Major customers, clients, etc., of businesses owned by reporting person—see instructions on page 6]

NAME OF BUSINESS ENTITY	NAME OF MAJOR SOURCES OF BUSINESS' INCOME	ADDRESS OF SOURCE	PRINCIPAL BUSINESS ACTIVITY OF SOURCE

PART E – INTERESTS IN SPECIFIC BUSINESS [Instructions on page 7]

	BUSINESS ENTITY #1	BUSINESS ENTITY #2	BUSINESS ENTITY #3
NAME OF BUSINESS ENTITTY			
ADDRESS OF BUSINESS ENTITY			
PRINCIPAL BUSINESS ACTIVITY			
POSITION HELD WITH ENTITY			
I OWN MORE THAN A 5% INTEREST IN THE BUSINESS			
NATURE OF MY OWNERSHIP INTEREST			

IF ANY OF PARTS A THROUGH E ARE CONTINUED ON A SEPARATE SHEET, PLEASE CHECK HERE

OATH

I, the person whose name appears at the beginning of this form, do depose on oath or affirmation and say that the information disclosed on this form and any attachments hereto is true, accurate, and complete.

[Handwritten Signature]

SIGNATURE

STATE OF FLORIDA

COUNTY OF

VOLUSIA

Sworn to (or affirmed) and subscribed before me this 20th day of March 2024 by Christopher R. Ditslear

[Handwritten Signature: Octavia Feltner]

(Signature of Notary Public—State of Florida)
Octavia Feltner

NOTARY PUBLIC

(Print, Type, or Stamp Commission Number and Name of Notary Public)

Comm# GG954171

Personally Known X OR Produced Identification Expires 5/21/2024

Type of Identification Produced _____



FLORIDA DEPARTMENT OF LAW ENFORCEMENT

DISCLOSURE PURSUANT TO THE
FAIR CREDIT REPORTING ACT (FCRA)

The Florida Department of Law Enforcement (FDLE) may obtain one or more consumer reports, including but not limited to credit reports, about you, for employment purposes as defined by the Fair Credit Reporting Act, including for determinations related to initial employment, reassignment, promotion, or other employment-related actions.

CONSUMER'S AUTHORIZATION FOR
FDLE TO OBTAIN CONSUMER REPORT(S)

I have read and understand the above Disclosure. I authorize the Florida Department of Law Enforcement (FDLE) to obtain one or more consumer reports on me, for employment purposes, as described in the above Disclosure.

Christopher R. Ditsleer

Printed Name of Applicant

C. Ditsleer

Signature of Applicant

Date: March 20, 2024

JUDICIAL APPLICATION DATA RECORD

The judicial application shall include a separate page asking applicants to identify their race, ethnicity and gender. Completion of this page shall be optional, and the page shall include an explanation that the information is requested for data collection purposes in order to assess and promote diversity in the judiciary. The chair of the Commission shall forward all such completed pages, along with the names of the nominees to the JNC Coordinator in the Governor's Office (pursuant to JNC Uniform Rule of Procedure).

(Please Type or Print)

Date: March 20, 2024
JNC Submitting To: Seventh Circuit
Name (please print): Christopher D. Isleer
Current Occupation: Attorney
Telephone Number: 386 738-4770 Attorney No.: 87335
Gender (check one): Male Female
Ethnic Origin (check one): White, non-Hispanic
 Hispanic
 Black
 American Indian/Alaskan Native
 Asian/Pacific Islander
County of Residence: Volusia

IN THE CIRCUIT COURT, SEVENTH JUDICIAL CIRCUIT, IN AND FOR VOLUSIA
COUNTY, FLORIDA

MASON WEBB,

Petitioner,

CASE NO. 2018-13016-FMDL
DIV. 3

vs.

MICHAEL KHALAF and
DOMINIQUE KHALAF,

Respondents.

MEMORANDUM OF LAW IN OPPOSITION TO RESPONDENTS' MOTION TO DISMISS

The Petitioner, MASON WEBB, by and through his undersigned attorney, files this, his Memorandum of Law in Opposition to Respondents' Motion to Dismiss and says:

1. Respondent's Motion to Dismiss appears to make two primary arguments, the first being that there was an insufficient allegation of "fraud" and that Petitioner's action is barred because he failed to timely file a claim with the Florida putative father registry prior to the step-parent adoption described in the petition.

2. The petition filed herein is a petition to establish paternity. Fraud is not a not a requisite showing in a paternity action. However, given the very unique circumstances of this action, the "fraudulent" actions of the associated players involved needed to be set forth in the petition in the opinion of the undersigned.

3. The primary focus in this action shouldn't be on the subsequent "step-parent adoption", but on the manner in which the presumption of paternity provided for in sec. 742.10 Fla. Stat. was created. The Fifth DCA has provided guidance on both the requisite showings and the procedure that the Court should follow in the unique circumstances presented herein in

A.D.A., the mother, and M.J.L., the father, vs. D.M.F. the husband, 204 So. 3d 523 (Fla. 5th DCA 2016).

4. In A.D.A., none of the various parties involved were initially married. The mother conceived a child with the boyfriend. They broke up prior to the birth. No father was initially listed on the birth certificate. Shortly after the birth, the boyfriend filed a paternity action and filed a claim with the putative father registry. A.D.A. at 524. The boyfriend then voluntarily dismissed his paternity action.

Two weeks later, the soon-to-be husband and the mother filed an Acknowledgement of Paternity Affidavit pursuant to section 742.10, Fla. Stat. naming the soon-to-be-husband as the father of the child (they married shortly thereafter.) A.D.A. at 524. Eventually, the mother and the husband filed for divorce and the mother and the boyfriend reconciled. at 525. A custody battle ensued between the mother and the husband and the boyfriend re-filed his paternity action. at 525.

5. The central issue in A.D.A. became whether or not the boyfriend's paternity case should proceed forward and DNA testing be administered to determine the boyfriend's biological paternity in light of the execution of the voluntarily acknowledgement of paternity executed by the mother and the husband and the 742.10 statutory presumption that attaches by virtue of the same.

6. The Fifth DCA began its discussion by pointing out the following:

*...Section 742(10)1 provides that, for a child born out of wedlock, where two parties file a "voluntary acknowledgement of paternity," such acknowledgement constitutes the establishment of paternity for the purposes of this chapter. The acknowledge creates a **rebuttable presumption** of paternity, subject to the right of any signatory to rescind the acknowledgment within 60 days after the date of the acknowledgment was signed or the date of an administrative or judicial proceedings relating to the child...*

A voluntary acknowledgment constitutes an establishment of paternity that can only be challenged in court on the basis of fraud, duress, or material mistake of fact. A.D.A. at 526-527.

7. The Fifth DCA then was very clear on the fact that the fraud alleged in the petition in this case is the type of fraud that would rebut the 742.10 presumption of paternity:

*Clearly, the section 742.10(1) presumption should not apply if the Acknowledgment of Paternity was fraudulent. **Such fraud would have occurred if the husband had no good faith basis for believing he was the biological father of the child. A presumption of paternity cannot rest on a false affidavit. A.D.A. at 527.***

8. In the petition filed herein, the Petitioner has alleged the following:

9. *Immediate after the birth of the minor child, the, the Respondent, MICHAEL KHALAF, acting in collusion with KAITLYN AZAR, executed a Florida Department of Health form DH-511 (Voluntary Acknowledgement of Paternity) naming the Respondent, MICHAEL KHALAF, as the biological father of the minor child.*

10. *At all times relevant, both Respondent, MICHAEL KHALAF, and KAITLYN AZAR, knew that the Voluntary Acknowledgement of Paternity of the minor child was false and fraudulent. The Respondent, MICHAEL KHALAF, and KAITLYN AZAR had never married and had never engaged in sexual intercourse with the other.*

This allegation clearly sets forth the requisite fraud that the Fifth DCA reasoned would not support the presumption of paternity in A.D.A.

9. The fact that the Respondents allege that the Petitioner failed to timely file a claim with the Florida putative father registry is factually irrelevant to the analysis that was set forth in A.D.A. Assuming for the purposes of argument that the allegations of the petition are true, the issue isn't whether the petitioner waived consent by not filing with the putative father registry, the issue is whether the actions of the Respondent, MICHAEL KHALAF (coupled with those of the biological mother) created a knowingly false and fraudulent establishment of paternity that permitted an end-run around the termination of parental rights and adoption statutes. The court

must be mindful that the Petitioner's parental rights were never terminated... parental rights were falsely created in MICHAEL KHALAF.

Although there was not an adoption component present in A.D.A., the Fifth DCA certainly foresaw the issue that is presently in front of the Court. In reversing the trial court, the Fifth DCA held:

We reverse and remand to the trial court for a hearing to determine if the husband's Acknowledgment of Paternity affidavit was "obtained through fraud, under duress, or that there was a material mistake in fact. If the affidavit was fraudulent, deciding this case against the rights of the biological father would be to condone an attempt to sidestep the adoption statute. If the Acknowledgement was neither fraudulent nor obtained as a result of a material mistake of fact, the husband was the child's legal father and the trial court rightly denied the boyfriend's motion for paternity testing. at 524.

10. Assuming the fact pled in the petition are true, the actions of the Respondent, MICHAEL KHALAF, coupled with those of the biological mother, certainly constituted a "sidestep" of the adoption statutes subsequent to his false establishment of paternity when the Respondents undertook the step-parent adoption. Pursuant to section 63.039(2), Fla. Stat., all adoptions must be conducted through an adoption entity unless they are stepparent or relative adoptions. Sec 63.039, Fla. Stat. places multiple affirmative obligations upon the adoption entity to ensure that all adoption procedures are followed. But-for the false establishment of paternity undertaken herein, the Respondent's would have been compelled to utilize the services of an adoption entity which would have been under an affirmative obligation to inquire about the identity of the biological father and furnish him with an intended adoption plan regardless of whether a claim had been filed with the putative father registry pursuant to section 63.062(3), Fla. Stat. The intended adoption plan:

...must specifically state that if the unmarried biological father desires to contest the adoption plan he must, within 30 days after service, file with the court a verified response that contains a pledge of commitment to the child in substantial compliance with

subparagraph (2)(b)2. and a claim of paternity form with the Office of Vital Statistics, and must provide the adoption entity with a copy of the verified response filed with the court and the claim of paternity form filed with the Office of Vital Statistics. The notice must also include instructions for submitting a claim of paternity form to the Office of Vital Statistics and the address to which the claim must be sent. If the party served with the notice of intended adoption plan is an entity whose consent is required, the notice must specifically state that the entity must file, within 30 days after service, a verified response setting forth a legal basis for contesting the intended adoption plan, specifically addressing the best interests of the child. sec. 63.062(3).

11. Because of the foregoing, the Petitioner has clearly stated a viable cause of action and the motion to dismiss should be denied. Moreover, the procedure set forth in A.D.A. should be followed. If the court finds that the basis for the voluntary acknowledgement of paternity was fraudulent, then DNA testing should be undertaken and the court should rule in accordance with the testing. If the court finds that MICHAEL KHALAF had a good faith belief that he was the child's natural father, then his voluntary acknowledgment of paternity is valid and not subject to challenge. A.D.A. at 527-528.¹

I HEREBY CERTIFY that a copy of the foregoing has been furnished to GEORGINA ROMAN-SECOR, by eservice this 15 day of Nov., 2018.



CHRISTOPHER R. DITSLEAR
Attorney for Petitioner
ditslearlaw@gmail.com
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DeLand, Florida 32720
(386) 738-4770
Fla. Bar No. 87335

¹ In A.D.A., the parties had already undergone genetic testing under the court order that was being appealed. From a practical standpoint, the undersigned believes that the genetic testing should be performed prior to the inquiry of whether or not the Voluntary Acknowledgment of Paternity was fraudulent. The "fraud trial" would not have to take place at all if pre-trial genetic testing ruled the Petitioner out as the biological father, thus saving all the parties substantial money in attorney's fees and the stress involved in litigation of this type.

IN THE CIRCUIT COURT, SEVENTH JUDICIAL CIRCUIT, IN AND FOR VOLUSIA COUNTY,
FLORIDA

BRITTANY LORAINE PETERSON,

CASE NO. 2023-31300-FMCI
DIV. 36

Petitioner/Mother,
and

JEFFREY ALAN ALLDREDGE,

Respondent/Father.

MOTION TO DISMISS

The Petitioner/Mother, BRITTANY LORAINE PETERSON, by and through her undersigned attorney pursuant to Fla. Fam. Law R. 12.140 moves this Court to enter an order dismissing the Supplemental Petition to Modify Final Judgment filed by the Respondent herein as the same fails to state a cause of action upon which the requested relief could be granted, to wit:

1. This Court entered a Final Judgment Establishing Paternity and Related Relief on June 7, 2023. Only eight months thereafter, the Respondent filed the pending petition for modification.

2. The agreed-upon timesharing plan in the parties' settlement agreement provided the Respondent/Father with timesharing on alternate Sundays at the Petitioner's residence and Fridays and holidays as agreed upon by the parties.

3. The supplemental petition for modification alleges ten separate items that claim to constitute a substantial change in circumstances. Although the ten items somewhat conflict with each other they can be categorized as follows:

a. The parties agreed to additional timesharing (or timesharing at an alternate location), then no longer agreed to additional timesharing;

b. The parties both moved;

c. The child is older.

4. The facts alleged fail, as a matter of law, to constitute a substantial change in circumstances that would support the modification of an established custody order for the foregoing reasons:

a. The fact that the parties, by mutual agreement, exercised additional or different timesharing cannot be considered a substantial change in circumstances to modify the final judgment. Allowing mutual agreements to change the timesharing schedule from time to time to serve as a basis for modifying custody decrees would have the deleterious effect of discouraging cooperation between parents when they agree to make temporary changes in their children's living arrangements to serve their children's best interests. Smoak vs. Smoak, 658 So. 2d 568 (Fla. 1st DCA 1995)

b. The parties alleged relocations of their respective residences also fails to allege a change in circumstances that would support a modification of the timesharing plan¹. In custody disputes involving the relocation of a parent, courts generally conclude that the relocation does not amount to a substantial change in circumstances if the relocation is not a significant distance away from the child's current location. Halbert vs. Morico, 27 So. 3d 771 (Fla. 2nd DCA 2010.)

¹ Of special note is the Respondent's allegation that "The Father's divorce is finalized and he is living with his parents in Bartow, Florida." A review of the Court file shows that the Respondent's address of record at the time of the final judgment was 6980 Snell Road, Bartow, Florida, thus leading one to the almost inescapable conclusion that the Respondent did not actually move after the entry of the final judgment.

For example, In Dickson vs. Dickson, 169 So. 3d 287 (Fla. 5th DCA 2015) the court held that a 49 mile relocation did not violate the marital settlement agreement or section 61.13. In doing so, the 5th DCA reasoned:

“Further, section 61.13001 defines “relocation” as a change in the location of the principal residence of the parent or other person from his or her principal place of residence at the time of the last order establishing or modifying time-sharing... **the change of location must be at least 50 miles from that residence.**” (emphasis added.)

Also, the Second District Court of Appeal held that “[a] forty-five mile relocation of a parent- increasing the drive time to and from school- is not so substantial as to justify a change in the custody arrangement...” DMJ vs. AJT, 190 So. 3d 1129 (Fla. 2nd DCA, 2016) discussing Halbert vs. Morico, 27 So. 3d 771 (Fla. 2nd DCA, 2010.)

Most importantly, there is no allegations of how these alleged relocations impacted the child or interfered with the Respondent’s timesharing.

c. The additional fact that the parties’ child is now older cannot, as a matter of law, support a custody modification. In one of the most eloquent opinions holding that increased age does not constitute a change in circumstances warranting a custody modification, the Second DCA reasoned as follows:

For better or worse, boys and girls eventually stop playing with their toys, and ask for the keys to the car. At different stages in their lives, boys and girls often find that a mother or father is the more significant or influential parent. It may be that common patterns in childhood development should sometimes cause divorced parents voluntarily to change the custodial parent of a child for a few months or even a few years. The child’s normal growth, as the father has alleged in this case, however, is not the type of substantial change in circumstances that the law requires to modify an initial custody determination.

Gibbs vs. Gibbs, 686 So. 2d 639 (Fla. 2nd DCA, 1996)

5. Due to the foregoing, the Respondent's supplemental petition for modification fails to set forth a cause of action upon which the requested relief could be granted and should therefore be dismissed.

I HEREBY CERTIFY that a copy of the foregoing has been furnished to SARA GLOVER, ESQ. via eservice this 27 day of Feb., 2024.



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