

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF FLORIDA**

Tallahassee Division

Civil Action No.

FLORIDA CHAPTER OF AMERICAN  
ACADEMY OF PEDIATRICS, INC.,

Plaintiff,

vs.

RANDY FINE in his capacity as Chair,  
Health & Human Services Committee,  
Florida House of Representatives.

Defendant.

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**COMPLAINT**

Plaintiff, Florida Chapter of American Academy of Pediatrics, Inc. sues Randy Fine in his capacity as Chair of the Health & Human Services Committee of the Florida House of Representatives.

1. This action seeks injunctive relief to quash a subpoena that violates Plaintiff's First Amendment speech and association rights. The Court has federal question jurisdiction pursuant to 42 U.S.C., section 1983 and 28 U.S.C., section 1331.

2. Plaintiff Florida Chapter of American Academy of Pediatrics, Inc. is a Florida incorporated association with over 2600 members. Its purpose is to secure quality healthcare for all children through public advocacy, continuing education, and support for pediatric physicians.

3. Defendant Randy Fine is the Chair of the Health & Human Services Committee of the Florida House of Representatives.

4. On April 24, 2023, Defendant issued a subpoena duces tecum to Plaintiff Commanding Plaintiff to produce to the Florida House of Representatives an extensive list of documents in 18 separate categories. A copy of the subpoena is attached as Exhibit A.

5. Among the documents Plaintiff was required to produce were internal documents of Plaintiff association reflecting communications, thought processes, and positions on a matter of political controversy by members of Plaintiff association.

6. The aforesaid subpoena requires Plaintiff to produce the documents by **Thursday, May 4, 2023, at 10:00 a.m.** and threatens to hold Plaintiff in contempt of the Florida House of Representatives resulting in punishment in accordance with article III, section 5 of the Florida Constitution and section 11.143, Florida Statutes.

7. The aforesaid subpoena violates the rights of Plaintiff and its individual members to free speech and association as guaranteed by the First Amendment to the United States Constitution.

8. Plaintiff has incurred attorney's fees in the prosecution of this action.

WHEREFORE, Plaintiff seeks the following relief;

(a) Emergency issuance of a preliminary injunction staying the operation of the subpoena duces tecum issued to Plaintiff on April 24, 2023.

(b) Issuance of a permanent injunction quashing the subpoena duces tecum issued to Plaintiff on April 24, 2023.

(c) Award of attorney's fees pursuant to 42 U.S.C., section 1988.

(d) Such additional relief as the court deems appropriate.

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s/Barry Richard  
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