LIBERTY COUNSEL

DISTRICT OF COLUMBIA
109 Second Street NE
Washington, DC 20002
Tel 202-289-1776
Fax 407-875-0770
LC.org

FLORIDA
PO Box 540774
Orlando, FL 32854
Tel 407-875-1776
Fax 407-875-0770

VIRGINIA
PO Box 11108
Lynchburg, VA 24506
Tel 407-875-1776
Fax 407-875-0770
Liberty@LC.org

REPLY TO FLORIDA

November 27, 2024

Via Electronic Mail Only
Orange County Board of Commissioners, CountyCommissioners@ocfl.net
Mayor Jerry L. Demings, mayor@ocfl.net
Nicole Wilson, district1@ocfl.net
Christine Moore, district2@ocfl.net
Mayra Uribe, district3@ocfl.net
Maribel Gomez Cordero, district4@ocfl.net
Emily Bonilla, Emily.Bonilla@ocfl.net
Mike Scott, district6@ocfl.net

RE: First Amendment, Fourteenth Amendment, and Religious Land Use and Institutionalized Persons Act (RLUIPA) Violations in Orange County Zoning Church Moratorium

Dear Orange County Board of Commissioners:

We write on behalf of a number of churches and constituents in Orange County to inform you that the actions currently proposed by Commissioner Emily Bonilla concerning a moratorium on zoning approvals for religious institutions and churches is blatantly unconstitutional and unlawful. For the reasons that follow, the Board of County Commissioners should unequivocally reject this proposal. Anything less would violate the First and Fourteenth Amendments to the United States Constitution and the Religious Land Use and Institutionalized Persons Act. Adopting a moratorium on churches in Orange County would subject the County to liability for civil rights violations.

I. INTRODUCTION.

In a Commissioner's Report for the Orange County Board of County Commissioners ("BCC"), Commissioner Emily Bonilla has proposed a complete moratorium on approval of Church permits (hereinafter the "Church Moratorium"). Specifically, the Church Moratorium states that the BCC should

> adopt an immediate moratorium on the acceptance, processing, and approval of **church permits or applications** in rural areas. This moratorium would prevent potential developments from proceeding under the current framework while updates are being developed. **The moratorium should apply to all church-related permits or applications in rural areas, including those currently in process but not yet approved.** This retroactive application is necessary to ensure that no projects move forward under the existing framework during the review and amendment period.

(A true and correct copy of the email memorandum containing the Church Moratorium is attached hereto as EXHIBIT A and incorporated herein (emphasis added).)

To mask the overt religious discrimination inherent in the Church Moratorium, the proposal states that the BCC needs "greater oversight of church developments in rural areas." (Ex. A, at 2.) To support the blatantly unconstitutional and unlawful Church Moratorium, Commissioner Bonilla states that "Residents have expressed concerns about the compatibility and potential impacts of large-scale church developments ("mega churches") on rural character, infrastructure, and environmental resources." (Ex. A, at 2.) Commissioner Bonilla states that "federal laws, such as the Religious Land Use and Institutionalized Persons Act (RLUIPA), impose legal constraints on local government authority to regulate religious institutions, requiring careful navigation to ensure compliance." (Ex. A, at 2.) Notably, if Commissioner Bonilla was actually concerned with RLUIPA compliance, she would recognize that a Church Moratorium, prohibiting the government approving any permits for the development of churches, is plainly unlawful regardless of the purported "careful navigation." One cannot navigate the First Amendment, the Fourteenth Amendment, nor RLUIPA in a manner so careful as to simultaneously exclude all churches from zoning approval and also comply with the Constitution's demands. Commissioner Bonilla states that there must be "appropriate oversight of church developments" (Ex. A, at 3), but the Church Moratorium provides not oversight, but unconstitutional exclusion of religion from Orange County.

The Church Moratorium violates the First Amendment Free Exercise Clause, the Fourteenth Amendment Equal Protection Clause, and the Religious Land Use and Institutionalized Persons Act.

II. ANALYSIS

A. The Church Moratorium Violates The First Amendment.

"A law burdening religious practice that is not neutral or not of general application must undergo the most rigorous of scrutiny." *Church of the Lukumi Babalu Aye, Inc. v. City of Hialeah*, 508 U.S. 520, 546 (1993). **"[G]overnment regulations are not neutral and generally applicable, and therefore trigger strict scrutiny under the Free Exercise Clause, whenever**

they treat *any* comparable secular activity more favorably than religious exercise." *Tandon v. Newsom*, 593 U.S. 61, 62 (2021) (bold emphasis added; italics original). "Government fails to act neutrally when it proceeds in a manner intolerant of religious beliefs or restricts practices because of their religious nature." *Fulton v. City of Philadelphia*, 593 U.S. 522, 533 (2021). "Here, that means the [BCC] is obliged under the Free Exercise Clause to proceed in a manner neutral toward and tolerant of [religious assemblies'] religious beliefs." *Masterpiece Cakeshop v. Colorado Civil Rights Comm'n.*, 584 U.S. 617, 638 (2018). "[N]eutrality and general applicability are interrelated, and . . . failure to satisfy one requirement is a likely indication that the other has not been satisfied." *Lukumi*, 508 U.S. at 531. "A law is not generally applicable if it invites the government to consider the particular reasons for a person's conduct by providing a mechanism for individualized exemptions." *Fulton*, 593 U.S. at 533 (cleaned up). A law can also fail general applicability "if it prohibits religious conduct while permitting secular conduct that undermines the government's asserted interests in a similar way." *Id.*

Here, there is no question that the Church Moratorium treats religious assemblies less favorably than nonreligious buildings and thus violates the Free Exercise Clause. It says nothing about nonreligious assemblies or building applications, but explicitly prohibits approval of Church applications. Indeed, it totally prohibits approval for zoning applications for Churches. (*See* Ex. A, at 2 ("This moratorium would prevent potential developments from proceeding under the current framework while updates are being developed. The moratorium should apply to all church-related permits or applications in rural areas, including those currently in process but not yet approved.").) And, the Church Moratorium prohibits approval of **any future or pending zoning applications** and **applies to all "church-related permits or applications**." (*Id.* (emphasis added).) Churches and religious institutions are targeted and singled out for a total prohibition. That is neither neutral nor generally applicable, and it plainly and unquestionably violates the First Amendment. Indeed, Commissioner Bonilla's targeting of churches in isolation is a *per se* violation of the Free Exercise Clause. *Trinity Lutheran Church of Columbia, Inc. v. Comer*, 582 U.S. 449, 466 n.14 (2017) (noting that "a law targeting religious beliefs as such is never permissible") (quoting *Lukumi*, 508 U.S. at 533).

B. The Church Moratorium Violates The Fourteenth Amendment.

The Equal Protection Clause of the Fourteenth Amendment makes it unconstitutional for the government to "deny to any person within its jurisdiction the equal protection of the laws." U.S. Const. amend. XIV § 1. "[T]he concept of equal protection has been traditionally viewed as requiring the uniform treatment of persons standing in the same relation to the government action questioned or challenged." *Reynolds v. Sims*, 377 U.S. 533, 565 (1964). The Equal Protection Clause "is essentially a direction that all persons similarly situated by treated alike." *City of Cleburne v. Cleburne Living Ctr.*, 473 U.S. 432, 439 (1985). To establish an equal protection claim, a party need only show that (1) the person, compared with others similarly situated, was selectively treated; and (2) that such selective treatment was based on impermissible considerations such as race, *religion*, intent to inhibit or punish the exercise of constitutional rights,

or malicious or bad faith intent to injure a person. *Strickland v. Alderman*, 74 F.3d 260 (11th Cir. 1996). The Church Moratorium plainly violates all aspects of an Equal Protection Claim.

Religious assemblies and churches are similarly situated to all other zoning applications. Churches and religious institutions, however, are singled out for disparate treatment because the Church Moratorium only prohibits approval of zoning applications for churches. *See* Ex. A, at 2 ("This moratorium would prevent potential developments from proceeding under the current framework while updates are being developed. The moratorium should apply to all church-related permits or applications in rural areas, including those currently in process but not yet approved.").) And, the Church Moratorium prohibits approval of **any future or pending zoning applications** and **applies to all "church-related permits or applications**." (*Id.* (emphasis added).)

The Church Moratorium is unquestionably motivated by a "[religiously] discriminatory intent or purpose." *Vill. of Arlington Heights v. Metro. Hous. Dev. Corp*., 429 U.S. 252, 265 (1977). In assessing discriminatory intent, courts may consider both direct and circumstantial evidence. *See Valentin v. Town of Natick*, 633 F. Supp. 3d 366, 374 (D. Mass. 2022). Circumstantial evidence may include the "historical background of the decision," *Portland Pipe Line Corp. v. City of S. Portland*, 288 F. Supp. 3d 321, 355 n.17 (D. Me. 2017) (quoting *Arlington Heights*, 429 U.S. 252 at 267–68), "the context in which the decision was made," *Chabad Lubavitch of Litchfield Cty., Inc. v. Litchfield Historic Dist. Comm'n*, 768 F.3d 183, 199 (2d Cir. 2014), and whether "legislators bowed to an impermissible community animus, most commonly manifested by an unusual level of constituent pressure," *Scott-Harris v. City of Fall River*, 134 F.3d 427, 438 (1st Cir. 1997), *rev'd on other grounds sub nom. Bogan v. Scott-Harris*, 523 U.S. 44 (1998).

All considerations demonstrate that the Church Moratorium represents unconstitutional religious discrimination against churches and religious assemblies. And, the Church Moratorium is plainly based on community dissent concerning religious assemblies. It states, "[r]esidents have expressed concerns about compatibility and potential impacts of large-scale church developments." (Ex. A., at 2.) There is no concern for other buildings, institutions, or assemblies—only churches. Thus, on its face, the Church Moratorium is impermissibly based on only those permit applications that come from religious churches. The Equal Protection Clause plainly prohibits such discriminatory treatment.

C. The Church Moratorium Violates RLUIPA.

The Religious Land Use and Institutionalized Persons Act ("RLUIPA") provides that "[n]o government shall impose or implement a land use regulation in a manner that imposes a substantial burden on the religious exercise of a person, including a religious assembly or institution," 42 U.S.C. § 2000cc(a)(1), unless the government can satisfy strict scrutiny—*i.e.*, demonstrate that the burden "is in furtherance of a compelling governmental interest; and . . . is the least restrictive means of furthering that compelling governmental interest." *Id.*

Under RLUIPA, "religious exercise" includes the "use, building, or conversion of real property for the purpose of religious exercise." 42 U.S.C. § 2000cc5(7)(B). And, "religious exercise" does not have to be "compelled by, or central to, a system of religious belief." 42 U.S.C. § 2000cc-5(7)(A). "In passing RLUIPA, Congress recognized that places of assembly are needed to facilitate religious practice, as well as the possibility that local governments may use zoning regulations to prevent religious groups from using land for such purposes." *Midrash Sephardi, Inc. v. Town of Surfside*, 366 F.3d 1214, 1226 (11th Cir. 2004). "Thus, challenges to zoning ordinances are expressly contemplated by the statute, and there is no doubt that the [Church Moratorium] challenge concerns "religious exercise" within the meaning of RLUIPA." *Id.*

1. The Church Moratorium Substantially Burdens Religious Worship.

The Church Moratorium plainly constitutes a substantial burden. As the Eleventh Circuit has held, "an individual's exercise of religion is substantially burdened if a regulation completely prevents the individual from engaging in religiously mandated activity, or if the regulation requires participation in an activity prohibited by religion." *Midrash*, 366 F.3d at 1227 (citing *Cheffer v. Reno*, 55 F.3d 1517, 1522 (11th Cir. 1995)). Here, the Church Moratorium completely prohibits Churches from proceeding with any development of their houses of worship. If that is not a substantial burden, nothing would ever suffice. Indeed, as the Eleventh Circuit has held, "[w]hatever substantial means, it most assuredly does *not* mean complete, total, or insuperable." *Thai Meditation Assoc. of Ala., Inc. v. City of Mobile*, 980 F.3d 821, 830 (11th Cir. 2020). Here, by definition, the Church Moratorium constitutes a substantial burden because it is complete, total, and insuperable of "all church-related permits and applications." (Ex. A, at 2.)

2. The Church Moratorium Violates Each of RLUIPA's Express Prohibitions.

RLUIPA has several key provisions, including an "Equal terms" provision, a "Nondiscrimination" provision, and an "Exclusions and limits" provision. 42 U.S.C. §§ 2000cc(b)(1)–(3). The equal terms provision mandates that no government "impose or implement a land use regulation in a manner that treats a religious assembly or institution on less than equal terms with a nonreligious assembly or institution." 42 U.S.C. § 2000cc(b)(1). The nondiscrimination provision mandates that no government "impose or implement a land use regulation that discriminates against any assembly or institution on the basis of religion." 42 U.S.C. § 2000cc(b)(2). The exclusions and limits provision mandates that no government "impose or implement a land use regulation that . . . totally excludes religious assemblies from a jurisdiction; or . . . unreasonably limits religious assemblies, institutions, or structures within a jurisdiction." 42 U.S.C. §2000cc(b)(3)(A). As shown below, the Church Moratorium violates all three.

a. The Church Moratorium Violates RLUIPA's Nondiscrimination Provision.

Under RLUIPA's nondiscrimination provision, Churches "need not offer a similar comparator to sustain" their claims. *See Irshad Learning Ctr. v. Cnty. of Dupage*, 937 F. Supp. 2d 910, 939 (N.D. Ill. 2013). Churches need only demonstrate that the government had treated it less favorably than other non-religious entities and that "a discriminatory impact was foreseeable," and "less restrictive alternatives were available." *Chabad Lubavitch of Litchfield Cnty., Inc. v. Litchfield Historical Dist. Comm'n*, 768 F.3d 183, 199 (2d Cir. 2014).

Here, there is no question that the Church Moratorium treats religious assemblies less favorably than nonreligious buildings. Indeed, it only prohibits approval for zoning applications for Churches. (*See* Ex. A, at 2 ("This moratorium would prevent potential developments from proceeding under the current framework while updates are being developed. The moratorium should apply to all church-related permits or applications in rural areas, including those currently in process but not yet approved.").) And, the Church Moratorium prohibits approval of **any future or pending zoning applications** and **applies to all "church-related permits or applications**." (*Id.* (emphasis added).) One need not search too far for how a discriminatory impact would be foreseeable from the Church Moratorium that is specifically, explicitly, and expressly intended to apply only to Church applications and completely prohibit approval of Church zoning applications.

b. The Church Moratorium Violates RLUIPA's Equal Terms Provision.

This statutory command "requir[es] equal treatment of secular and religious assemblies [and] allows courts to determine whether a particular system of classifications adopted by a city *subtly or covertly departs from requirements of neutrality and general applicability.*" *Midrash Sephardi, Inc. v. Town of Surfside*, 366 F.3d 1214, 1232 (11th Cir.2004) (emphasis added). *See also Primeria Iglesia Bautista Hispana of Boca Raton, Inc. v. Broward Cnty.*, 450 F.3d 1295, 1307 (11th Cir. 2006) (same). "There are four elements of an Equal Terms violation: (1) the plaintiff must be a religious assembly or institution, (2) subject to a land use regulation, that (3) treats the religious assembly on less than equal terms, with (4) a nonreligious assembly or institution." *Primera Iglesia*, 450 F.3d at 1307.

> [There are] at least three distinct kinds of Equal Terms statutory violations: (1) a statute that facially differentiates between religious and nonreligious assemblies or institutions; (2) a facially neutral statute that is nevertheless "gerrymandered" to place a burden solely on religious, as opposed to nonreligious, assemblies or institutions; or (3) a truly neutral statute that is selectively enforced against religious, as opposed to nonreligious assemblies or institutions.

Id. at 1308.

The Church Moratorium plainly violates the Equal Terms provision. The Church Moratorium facially differentiates between religious Churches—which cannot obtain any permit—and nonreligious assemblies that are not mentioned at all. (*See* Ex. A, at 2 ("This moratorium would prevent potential developments from proceeding under the current framework while updates are being developed. The moratorium should apply to all church-related permits or applications in rural areas, including those currently in process but not yet approved.").) And, the Church Moratorium prohibits approval of **any future or pending zoning applications** and **applies to all "church-related permits or applications**." (*Id.* (emphasis added).) Thus, the Church Moratorium facially differentiates between religious and non-religious assemblies and institutions. On its face, Churches and religious institutions are treated less favorably than nonreligious assemblies, the Church Moratorium is facially drawn to gerrymander Churches and religious assemblies out of the permit application process, and the Church Moratorium facially selects for differential enforcement of the various zoning application requirements.

The Eleventh Circuit has held that a facially discriminatory zoning ordinance that prohibited religious assemblies while permitting nonreligious institutions and assemblies violated the Equal Terms provision. *See Midrash*, 366 F.3d at 1231-35. *See also Primera Iglesia*, 450 F.3d at 1308 ("a zoning district in which certain non-religious assemblies and institutions were permitted, but religious assemblies were prohibited . . . facially violate[s] RLUIPA's Equal Terms provision."). Moreover, a zoning regulations "that depart from basic principles of neutrality may also support a RLUIPA Equal Terms violation," where—as here—"the challenged zoning regulation separates permissible from impermissible assemblies or institutions in a way that burdens "almost only" religious uses." *Id.* at 1309-10. Thus, The Church Moratorium therefore plainly violates the Equal Terms provision of RLUIPA. "Simply put, to deny equal treatment to a church or a synagogue on the grounds that it conveys religious ideas is to penalize it for being religious," and violates RLUIPA's Equal Terms provision. *Midrash*, 366 F.3d at 1239.

c. The Church Moratorium Violates RLUIPA's Exclusions and Limits Provision.

A violation of the total exclusion may be found where—as here—the Church Moratorium has "the effect of depriving [Churches] and other religious institutions and assemblies of reasonable opportunities to practice their religion, including the use and construction of structures." *Rocky Mountain Christian Church v. Bd. of Cnty. Comm'rs*, 613 F.3d 1229, 1238 (10th Cir. 2010). Indeed, as this Court has recognized, "[t]he church need not move to another [jurisdiction] [when] it is entitled to stay put" and practice its religion freely, as the First Amendment entitles it to do. *Church of Our Lord and Savior Jesus Christ v. City of Markham*, 913 F.3d 670, 681 (7th Cir. 2019). Indeed, "**[i]t is clear from the plain language of the statute that the purpose of this provision is not to examine the restrictions placed on individual landowners, but to prevent municipalities from broadly limiting where religious entities can locate**." *Church of Scientology of Ga., Inc. v. City of Sandy Springs*, 843 F. Supp. 3d 1328, 1377 (N.D. Ga. 2012) (emphasis added).

The Church Moratorium represents a total exclusion and an unreasonable limitation on the approval of zoning applications for religious assemblies and Churches. (*See* Ex. A, at 2 ("This moratorium would prevent potential developments from proceeding under the current framework while updates are being developed. The moratorium should apply to all church-related permits or applications in rural areas, including those currently in process but not yet approved.").) And, the Church Moratorium prohibits approval of **any future or pending zoning applications** and **applies to all "church-related permits or applications**." (*Id.* (emphasis added).) Thus, the Church Moratorium cannot survive the exclusions and limits provision of RLUIPA.

III. CONCLUSION

The Church Moratorium plainly violates the First Amendment, the Equal Protection Clause of the Fourteenth Amendment, and RLUIPA. The BCC is simply not permitted to exclude churches and religious assemblies from a zoning ordinance, nor is it permitted to place a total prohibition—even if temporary—on religious institutions.

Mathew D. Staver[t]
Founder and Chairman
LIBERTY COUNSEL

John T. Stemberger[tt]
President
LIBERTY COUNSEL ACTION

[t] Licensed in Florida and the District of Columbia

[tt] Licensed in Florida

Subject	Fwd: Commissioner's Report: 12/3/2024 on the Establishing Board Oversight for Church Developments in Rural Areas
From	Maribel Gomez <maribelgomez67@gmail.com>
To:	Mildred Fernandez <mildredfernandez2013@yahoo.com>
Date	Today at 7:18 AM

Sent from my iPhone

Begin forwarded message:

From: "Gomez Cordero, Maribel (Commissioner)" <Maribel.GomezCordero@ocfl.net>
Date: November 22, 2024 at 4:51:37 PM EST
To: Maribel Gomez <maribelgomez67@gmail.com>
Subject: FW: Commissioner's Report: 12/3/2024 on the Establishing Board Oversight for Church Developments in Rural Areas

Blessings,

Maribel Gomez Cordero
Orange County Commissioner District 4
District4@ocfl.net
407-836-5881
Orange County Government www.orangecountyfl.net

From: Bonilla, Emily (Commissioner) <Emily.Bonilla@ocfl.net>
Sent: Friday, November 22, 2024 4:45 PM
To: County Commissioners <CountyCommissioners@ocfl.net>; County Mayor's Office <CountyMayorsOffice@ocfl.net>; Gillespie, Cheryl <Cheryl.Gillespie@ocfl.net>; Brooks, Byron W <Byron.Brooks@ocfl.net>; Newton, Jeffrey <Jeffrey.Newton@ocfl.net>
Cc: kellysemrad.d5@gmail.com
Subject: Commissioner's Report: 12/3/2024 on the Establishing Board Oversight for Church Developments in Rural Areas

Please see attached memo. Content is also included below.

(Please do not respond to stay in compliance with Sunshine Laws.)

Purpose
This memo seeks to initiate a discussion during the December 3rd Board of County Commissioners (BCC) meeting regarding the need to amend Orange County's zoning code and comprehensive plan to ensure greater oversight of church developments in rural areas. I also recommend that the BCC enact an immediate moratorium on the acceptance and processing of any church permits or applications in rural areas, including those currently in process but not yet approved, while these updates are being considered.

Background
Currently, under Orange County's zoning code, churches are permitted by right in A-2 zoning districts, including areas within the rural boundary. Unlike developments in rural settlements, these projects are not subject to special exception requirements or BCC oversight. This regulatory framework creates the following challenges:

1. Community Concerns: Residents have expressed concerns about the compatibility and potential impacts of large-scale church developments ("mega churches") on rural character, infrastructure, and environmental resources.
2. Regulatory Gap: The current code does not distinguish between small, low-impact churches and large developments, which can have significant implications for rural areas.
3. Limited County Oversight: The absence of a public hearing or BCC review process limits the county's ability to address compatibility and consistency with the rural area's character.

Additionally, federal laws, such as the Religious Land Use and Institutionalized Persons Act (RLUIPA), impose legal constraints on local government authority to regulate religious institutions, requiring careful navigation to ensure compliance.

Proposed Actions
1. Code and Comprehensive Plan Amendments

Amendments
I propose that the county consider amending:
- Chapter 38 of the Orange County Code of Ordinances: Require a special exception and BZA/BCC review for churches in rural areas.
- Future Land Use Element of the Comprehensive Plan: Introduce policies requiring BCC oversight for institutional uses in rural areas.

These changes would ensure a transparent and consistent review process while addressing community concerns about large-scale developments in rural areas.

2. Immediate Moratorium
To allow adequate time for staff to draft and implement these amendments, I recommend that the BCC adopt an immediate moratorium on the acceptance, processing, and approval of church permits or applications in rural areas. This moratorium would prevent potential developments from proceeding under the current framework while updates are being developed. The moratorium should apply to all church-related permits or applications in rural areas, including those currently in process but not yet approved. This retroactive application is necessary to ensure that no projects move forward under the existing framework during the review and amendment period.

3. Staff Analysis and Recommendations
Direct staff to conduct a detailed analysis of the following:
- Compatibility criteria for church developments in rural areas.
- Best practices from other jurisdictions for regulating large-scale religious institutions while complying with RLUIPA.
- Potential impacts on infrastructure, traffic, and rural character.

Conclusion
These proposed actions aim to address community concerns, preserve the character of rural areas, and establish a framework for appropriate oversight of church developments. I look forward to discussing these recommendations with the Board and working together to achieve a balanced solution.

Action Requested:
I request that the BCC consider and provide direction on the following during the December 3rd meeting:
1. Approval to move forward with drafting amendments to Chapter 38 and the Comprehensive Plan.
2. Adoption of an immediate moratorium on church permits or applications in rural areas, including those currently in process but not yet approved.
3. Direction to staff to research and propose criteria for evaluating institutional uses in rural areas.

/s/

Commissioner Emily Bonilla
Commissioner-Elect Kelly Semrad

Cc: Byron W. Brooks, County Administrator
Cheryl Gillespie, Supervisor, Agenda Development
County Attorney's Office

Your Commissioner,

Emily Bonilla

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Emily Bonilla

Orange County Commissioner

Orange County – District 5

201 S. Rosalind Avenue, Orlando, FL 32802

Office: 407-836-7350