

**ELEVENTH CIRCUIT REAFFIRMS
DE MINIMIS FORCE**

On August 4, 2026, the United States Eleventh Circuit Court of Appeals decided *Phillips v. City of Hanceville, Alabama*, 184 F.4th 1267 (11th Cir. 2026).

The Appellant, Joshua Phillips, initially stopped his automobile at a police department roadblock, where two officers – Officers Kyle Duncan and Josh Howell- recognized him and asked him to produce his driver’s license. Phillips refused and became combative. Phillips eventually produced his license, and the officers allowed him to leave.

About two weeks later, Phillips encountered the same Officers at a convenience store. Phillips initially spoke with Officer Duncan, and that interaction was cordial. As Phillips left the store, Officer Howell arrived out of uniform and in his personal vehicle. Howell approached Phillips, got within a foot of him, and told him he had a problem with him. Phillips did nothing, and Howell entered the store. Phillips then followed Howell into the store, approached Duncan, and asked Duncan to write a report about his confrontation with Howell, but Duncan refused.

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**GOVERNMENTAL ENTITIES IN FLORIDA HAVE
A DE FACTO ECONOMIC LOSS RULE NOT
AVAILABLE TO PRIVATE DEFENDANTS**

In 2013, the Florida Supreme Court, in the case of *Tiara Condo. Ass’n v. Marsh & McLennan Cos.*, 110 So. 3d 399, 400 (Fla. 2013) reeled in increasing exceptions to the economic loss rule in tort actions by ruling that the legal doctrine, which bars causes of action in tort seeking damages for purely economic loss, was only applicable in products liability cases. Historically, the economic loss rule would come into play wherein Plaintiffs would attempt to bring tort actions to recover damages against parties they are in privity of contract with (or that lacked privity, but sought to recover damages anyhow based on interactions involving the parties), other than contractual damages or theories that may have been available to them. The economic loss rule would prevent recovery based on both contractual and tort theories arising from the same interaction of the parties. Therefore, damages sought for purely economic loss were barred in tort under

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Phillips then drove to the police station and spoke with the dispatcher to file a complaint. The dispatcher asked him to wait. While he was waiting, Duncan and Howell arrived. Phillips told Duncan he was there to file a complaint about his interaction with Howell at the store. Howell defended his conduct, and he and Phillips began to argue.

Duncan initially attempted to de-escalate the situation, but then became frustrated and asked Phillips to leave. Duncan threatened to arrest Phillips for disorderly conduct if he did not comply.

Initially, Phillips did not leave, but eventually began to do so. Duncan walked behind him, put his hand on Phillips's back, and lightly pushed him towards the exit. Phillips clenched his fists, turned toward Duncan, and yelled an expletive at him. The Officers immediately attempted to restrain Phillips. Duncan wrapped his arm around the back of Phillips's neck while Howell grabbed his torso from behind. Phillips resisted, so Duncan pulled him to the ground. Howell was on top of Phillips and grabbed one of Phillips's arms but could not fully restrain him. A third officer approached. Phillips managed to stand up and continue to struggle for about 45 seconds until the Officers could handcuff him. The Officers pressed Phillips against a wall as they prepared to move him to a holding cell. Phillips then leaned away from the wall and turned to confront Howell, who pushed Phillips back into the wall. The Officers then escorted Phillips out of the hallway to a cell.

Phillips remained in the holding cell for a "couple of hours" until an officer retrieved him for pre-release booking. Phillips began to complain, but was told to "quiet down" so he could be released from jail. Phillips instead got louder, stood up off the bench, and began to curse. According to Phillips, he was then spit on, grabbed by the neck, and walked back to his cell before being released later that day. He was charged with disorderly conduct and resisting arrest, which prosecutors later dropped.

Phillips brought suit against the Officers and the City of Hanceville for violating his constitutional rights, alleging he was arrested without probable cause, retaliation for attempting to file a complaint, and excessive force. He also sought to hold the City liable for the Officers' conduct. The District Court granted summary judgment for the Officers and the City, finding probable cause existed for Phillips's arrest and that only *de minimis* force was used. It ruled the City was not liable under Section 1983 because Phillips failed to prove a constitutional violation.

On appeal, the Eleventh Circuit affirmed the judgment of the District Court. First, it determined that the Officers had probable cause under Alabama law to arrest Phillips for disorderly conduct. Phillips engaged in "threatening behavior" when he turned towards Duncan with balled-up fists and screamed at him, which was an "unreasonable noise." The Officers also had probable cause to arrest him for trespass. Similarly, Phillips's First Amendment claims also failed because he needed to plead and prove an absence of probable cause. Because the Officers had probable cause to arrest Phillips, his claim for a retaliatory arrest failed.

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the doctrine, but the parties could proceed on any contractual theories available to them. However, the Florida Supreme Court in *Tiara Condo Ass'n* limited the application of the doctrine to only products liability causes of action, meaning purely economic damages are recoverable for other tort theories and subject matter.

Fortunately, governmental entities in the State of Florida have a *de facto* economic loss rule built into Fla. Stat. §768.28. Subsection (1) of the statute provides that “the state, for itself and its agencies or subdivisions, hereby waives sovereign immunity for liability for tort, but only to the extent specified in this act.” The subsection further explains that actions in tort to recover damages may be pursued against the state agencies for “injury or loss of property, personal injury, or death. . .” Florida Courts have consistently interpreted this language as barring any claims for purely economic loss in tort against governmental entities.

In 2026, the Florida Fourth DCA in *Beck v. North Broward Hosp. Dist.*, affirmed a trial court’s dismissal of the Complaint, with prejudice, wherein the Plaintiff brought a claim in negligence against the Hospital District for economic damages attributed to a data breach resulting in the use of personal and health information by unauthorized third parties. *See Beck v. North Broward Hosp. Dist.*, 428 So. 3d 135, 141 (Fla. 4th DCA 2026). The Fourth DCA in *Beck* affirmed that the economic damages associated with the data breach were outside the scope of the limited waiver of immunity contained in Fla. Stat. §768.28(1) because the claimed damage to privacy rights did not include any actual damage to tangible property. *See id.*

Other recent decisions have reached a similar conclusion based on different factual scenarios and tort causes of action. *See Fla. Int’l Univ. Bd. Of Trs. v. Signal Safe, Inc.*, 388 So. 3d 1103 (Fla 3rd DCA 2024) (reversing trial court’s denial of FIU’s Motion to Dismiss software company’s negligence count based on sovereign immunity where third-party software company sought generalized economic damages as the result of the suspension of use of its product, and failed to identify any injury or loss of property as is statutorily required); *See further City of Fort Lauderdale v. Tropical Paradise Resorts*, 372 So. 3d 663 (Fla. 4th DCA 2023) (reversing trial court’s denial of City’s Motion to Dismiss Hotel’s lawsuit based on counts of negligence, fraud in the inducement, fraudulent misrepresentation, and negligent misrepresentation finding that the damages sought in those counts were not for injury or loss of property, personal injury, or death, and are therefore barred); *See also City of Pembroke Pines v. Corr. Corp. of Am.*, 274 So. 3d 1105 (Fla. 4th DCA 2019) (reversing trial court’s denial of City’s Motion to Dismiss on sovereign immunity grounds for counts of promissory estoppel and tortious interference).

By: Chris Prusinowski

2026 LEGISLATIVE UPDATE

The 2026 Legislative Session saw 1,896 bills introduced, with a total of 251 bills which actually passed and became law through the Governor's inaction or signature. A normal session sees anywhere from 180 to 260 bills, so this year was definitely on the high side.

The following is meant to be an overview of some of the legislative changes that will either impact or cause potential liability for local government entities. There may be other parts of these bills or other bills that you have discussed with your counsel that will impact your entity as well; however, this is simply designed to be a sampling of those bills believed to have the most impact.

SB 290 – Sen. Keith Truenow
(HB 433 – Rep. Danny Alvarez)

Laws of Florida 2026-3

SB 290 updates Florida agricultural policy by further preempting local regulation of agritourism events. Agritourism has recently been an undefined thorn in the side of local government. As we continue to figure out exactly what agritourism actually means, the legislature continues to chip away at local government's right to regulate these uses. While the current statute allows local government to address substantial offsite impacts of agritourism activities or an emergency, the new legislation prohibits requiring a property owner to obtain a rural event venue permit or license. "Rural event venue" means a venue located on property classified as agricultural pursuant to s. 193.461 and used for special functions, such as weddings, receptions, corporate meetings, or similar gatherings.

Effective July 1, 2026

HB 399 – Rep. David Borrero
(SB 208 – Sen. Stan McClain)

Laws of Florida 2026-7

HB 399 limits local standards for denying composting projects. An existing permit for a facility that processes compost as defined in F.S.S. 576.011 may not be revoked by the local government if such activity is regulated through and in compliance with applicable implemented best management practices, interim measures, or regulations adopted as rules under Chapter 120 by the Department of Environmental Protection, the Department of Agriculture and Consumer Services, or a water management district as part of a statewide or regional program.

That means, regardless of whether you have a citizen complaint related to odors or other concerns, you will not be able to use your powers of code enforcement to revoke approvals

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for failing to comply with your conditions so long as they are in compliance with the state permits.

Effective: March 18, 2026

**HB 425 – Rep. Wallace Aristide
(SB 34 – Sen. Barbara Sharief)**

Laws of Florida 2026-87

HB 425 requires local governments to approve certain land-use and zoning changes for excess vacant land owned by historic African-American cemeteries when the land is sold to fund cemetery maintenance. Limits local land-use discretion for these specific parcels. In other words, these cemeteries could gain development flexibility for vacant adjacent land, which could in turn open the door to reverse challenges of neighboring property owners through Florida Statutes Chapter 163.3215 – de novo action for Declaratory Judgment.

Effective: July 1, 2026

**SB 686 – Sen. Stan McClain
(HB 691 – Rep. Adam Botana)**

Laws of Florida 2026-34

SB 686 creates a new county certification process for agricultural enclaves (farmland surrounded by development), accelerating their movement into development review. Limits county land-use discretion and imposes new administrative/infrastructure coordination demands. Denial of certification is appealable within 30 days to the circuit court through a petition for writ of certiorari – the decision-making body MUST issue a written decision with detailed findings of fact and conclusions of law.

Effective: July 1, 2026

**HB 803 – Rep. Dana Trubus
(SB 1234 – Sen. Nick DiCeglie)**

Laws of Florida 2026-63

HB 803 requires that Manufactured Homes MUST be permitted as a matter of right in ANY zoning district where single-family detached dwellings are allowed. A local government may not adopt or enforce zoning, land use, or development regulations which treats offsite constructed residential dwellings differently or more restrictively than single-family site-built dwellings. Many jurisdictions have outright prohibited manufactured homes in certain zoning

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districts – this will no longer be permitted. May only regulate through architectural standards now and cannot enforce anything that existed prior. This legislation trumps any existing ordinance or code regulation.

Effective: July 1, 2026

**HB 927 – Rep. Judson Sapp
(SB 1138 – Sen. Ralph Massullo Jr.)**

Laws of Florida 2026-64

HB 927 requires that every county with a population of more than 75,000 MUST create and implement a program for pre-development consultation services for an applicant. While most, if not all, local governments have pre-development processes, this legislation makes the process mandatory. Mandatory government action fosters lawsuits for Mandamus...In other words, if a citizen does not like the government's response to a development proposal, it can translate to the government is not performing a mandatory duty they are legally required to perform. This type of law also fosters negligence suits related to "bad advice." Government officials have given mistaken development advice from time to time. While this type of suit would likely be met with a Motion to Dismiss or Summary Judgment based on the *Trionon Park* case- planning-level function that is discretionary and immune from liability- it certainly will not stop the lawsuits from being filed under a claim that this statutory requirement makes the "advice" an operational-level function where liability applies.

Effective: July 1, 2026

**HB 1389 – Rep. Mike Redondo
(SB 1548 – Sen. Alexis Calatayud)**

Laws of Florida 2026-179

HB 1389, Live Local 4.0 - expands Florida's existing affordable housing preemption laws for counties and municipalities. It requires local governments to allow certain multifamily and mixed-use residential developments on land owned by religious institutions that is over 3 acres in size and has had a house of worship on the site for at least 10 years. There is no public hearing process required for the zoning change, and the legislation also limits local government's right to impose height, setback, and step-back requirements for such developments.

Effective: July 1, 2026

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**SB 1434 – Sen. Alexis Calatayud
(HB 979 – Rep. David Borrero)**

Laws of Florida 2026-84

SB 1434 requires local governments in certain large counties to administratively approve residential development on qualifying brownfield or previously developed parcels. Preempts conflicting local zoning, establishes density limits, and shifts review authority from elected governing boards to administrative staff approval.

Effective May 21, 2026

**SB 1614 – Sen. Tom Leek
(HB 1169 – Rep. Chase Tramont)**

Laws of Florida 2026-126

SB 1614 removes local governments' authority to use excess/surplus Florida Building Code enforcement funds to construct facilities for building departments. Surplus funds may still be used for fee rebates, technology upgrades, and training. It is important to note that anyone who has had a building permit issued by a local government and paid a fee may bring a civil action against the local government to enforce this section.

Effective: July 1, 2026

**SB 118 – Sen. Keith Truenow
(HB 39 – Rep. Danny Nix, Jr.)**

Laws of Florida 2026-37

SB 118 addresses how counties, municipalities, and special districts may levy special assessments on recreational vehicle parks. Constrains local special-assessment authority for these properties. The terrifying part is the fact that since the law went into effect April 21, 2026, it was likely too late for local governments to perform a new study if their methodology was inconsistent with the new levy requirements for RV parks.

Effective April 21, 2026

**HB 1329 – Rep. Fiona McFarland
(SB 1566 – Sen. Nick Diceglie)**

Laws of Florida 2026-161

HB 1329 imposes new budget-transparency requirements on counties and municipalities: revises timeframes for posting tentative and final budgets online (tentative posted ≥ 5 days before hearing and kept online ≥ 45 days; final posted within 30 days and kept ≥ 5 years), requires a public budget workshop including a budget-reduction exercise, and requires publication of budget-development calendars on or before January 30th each year. Specifically stated in the legislation is that failure to publish the calendar itself may not serve as a basis for bringing a civil or equitable action challenging adoption of the budget. I highlight this seemingly insignificant statement because THAT just means all other new requirements can be the basis for bringing a lawsuit and challenging the adoption of the budget.

Effective: January 1, 2027

**HB 1134 – Rep. Clay Yarborough
(SB 1001 – Sen. Dean Black)**

Laws of Florida 2026-43

HB 1134 Prohibits counties and municipalities from funding, promoting, or taking official action related to diversity, equity, and inclusion (DEI); voids conflicting ordinances/resolutions/policies; bars expenditure of any funds for DEI offices or officers; and provides that a local official who violates the law commits misfeasance or malfeasance in office (removable from office). A civil action may be brought in circuit court by a resident in the county/city. The court can award declaratory and injunctive relief, damages, and costs.

Effective: January 1, 2027

**HB 655 – Rep. Wyman Duggan
(SB 332 – Sen. Jennifer Bradley)**

Laws of Florida 2026-142

HB 655 authorizes a “shade session” by allowing a state or local agency to meet privately with the agency’s attorney during the 90-day pre-suit notice period for claims under the Bert J. Harris, Jr., Private Property Rights Protection Act. The closed session permission is the same as the existing litigation shade meeting allowance and only covers settlement negotiations or strategy related to the claim.

Effective: July 1, 2026

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**HB 905 – Rep. Jenna Persons-Mulicka
(SB 1178 – Sen. Erin Grall)**

Laws of Florida 2026-66

HB 905, titled the “Foreign Interference Restriction and Enforcement Act,” establishes new safeguards aimed at limiting the influence of certain foreign governments and affiliated entities within Florida’s political system, government operations, and critical infrastructure. Everyone knows the ethics rule regarding gifts - no public officer, employee, local government attorney, or candidate may solicit or accept anything of value, including a gift, loan, favor, service, etc., taken to influence one's vote, official action, or judgment. The new part says if you do accept a gift for such a purpose and the gift is coming from an entity representing or acting on behalf of a foreign terrorist organization or foreign country of concern, in addition to any criminal or civil penalty, you have to repay double the value of the benefit received as a result of the violation.

Just in case you are unaware – foreign countries of concern are:

The Chinese Communist Party
Russian Federation
Islamic Republic of Iran
Democratic People's Republic of Korea (North Korea)
Republic of Cuba
Venezuelan regime of Nicolás Maduro
Syrian Arab Republic

Effective: July 1, 2026

**SB 504/506 – Sen. Danny Burgess
(HB 509/511 – Rep. Bill Partington)**

Laws of Florida 2026-48/49

SB 504 establishes statewide requirements (written policies, training, records retention) for local governments that allow code inspectors to use body cameras.

SB 506 creates a public-records exemption for local-government code-inspector body-camera recordings depicting private property or sensitive situations; requires ≥90-day retention; subject to Open Government Sunset Review repeal in 2031.

Public records related statutes generally have a way of making case law...

Effective: July 1, 2026

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**SB 984 – Sen. Nick Diceglie
(HB 8113 – Rep. Demi Busatta)**

Laws of Florida 2026-99

SB 984 expands firefighter cancer benefits by clarifying employer obligations, including post-employment benefit payments and continued death benefits. Increases long-term financial exposure for county and municipal fire departments (local government as employer).

The Old Rule: If an eligible firefighter left their department and subsequently died from cancer (or complications from cancer treatment), their family risked losing access to line-of-duty death benefits because the firefighter was no longer an active employee.

The 2026 Revision: Employers are now mandated to provide death benefits to a firefighter's beneficiaries for 1 full year after the firefighter leaves employment. To qualify, the firefighter must have met the other cancer benefit criteria at the time they left employment and must not have worked as a firefighter anywhere else after leaving.

Effective July 1, 2026

**HB 991 – Rep. Jenna Persons-Mulicka
(SB 91 – Sen. Erin Grall)**

Laws of Florida 2026-26

HB 991 provides that voters must be United States citizens effective January 1, 2027, with a stronger check and balance system in place, strengthens candidate qualification requirements, revises requirements related to voter applications, registration, and identification information, and revises certain regulations related to criminal violations/penalties of the Election Code. Related to candidate qualifications, the legislation prohibits a person from qualifying if he or she does not meet political party affiliation requirements or if he or she legally changes his or her name through the general petition process during the 365 days preceding qualifying and provides a civil cause of action for enforcement. Election suits seem to be a hot topic these days, so this legislation will likely inspire new causes of action.

Effective: July 1, 2026, and January 1, 2027

Just as important as what did pass is what the Governor vetoed.

HB 145 / SB 1366 — Sovereign Immunity Tort Caps
(passed the Senate 36-0 and the House 108-0)

Governor DeSantis characterized higher caps as an invitation to file "unmeritorious" lawsuits.

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Additionally, the Eleventh Circuit also agreed that only *de minimis* force was used. Because the officers were justified in arresting Phillips, they “necessarily” had “the right to use some degree of physical coercion or threat thereof to effect it.” Phillips also contended that he suffered significant injuries. However, the Eleventh Circuit concluded that “established examples of *de minimis* force do not cease to be *de minimis* when they produce unexpected injuries.”

This included Phillips’s claim that the Deputy Chief, Adama Hadder, used excessive force while dragging him by his neck. Phillips stated that Hadder applied “200 or 300 pounds of force to his neck.” The Eleventh Circuit characterized Phillips’s testimony as “hyperbole” and cited to a medical journal, which noted that only 11 pounds of pressure placed on both carotid arteries for 10 seconds is necessary to cause a loss of consciousness. As a result, the Eleventh Circuit stated that Phillips cannot create a genuine issue of material fact with testimony “so fantastic, so internally inconsistent, or so speculative that it has no probative value.”

Finally, the Eleventh Circuit agreed that the City was not liable because Phillips failed to show an underlying constitutional injury.

By: David R. Jadon

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The Florida Statutes, Section 768.28, caps remain unchanged:

\$200,000 per person / \$300,000 per incident.

SB 382 / HB 243 — E-bike/Micromobility
(passed Senate 37-0 and House 112-0)

The legislation placed some responsibility on the e-bike/scooter user and included language regarding the creation of a task force and keeping data on accidents to help recommend improvements to Florida law to better regulate the use of these instrumentalities (dangerous or not).

With the focus this year definitely on privacy of the people - with the whole Flock camera business lurking- this bill had the Governor more concerned about tracking people than avoidance of unmeritorious lawsuits. DeSantis's veto letter stated the bill "will likely lead to enhanced surveillance by local governments against citizens."

If you have any concerns regarding the potential impacts of the new legislation, I encourage you to speak to your local counsel regarding the same; however, feel free to contact our office with any questions related to practical application.

By: Sherry G. Sutphen

FIRM SUCCESS

DEFENSE TEAM PREVAILS AT TRIAL FOR SCHOOL BOARD IN EMPLOYMENT DISCRIMINATION MATTER

Congratulations to Jeff Ashton, and Pausha Taghdiri who recently secured a significant defense victory following a jury trial involving allegations of racial discrimination arising from the termination of a high school track coach. The plaintiff alleged that his termination was motivated by racial bias. However, our defense team presented evidence that the employment decision rested on legitimate, non-discriminatory reasons supported by the facts and circumstances surrounding the incident.

After a week-long trial, the jury returned a complete defense verdict, rejecting the plaintiff's discrimination allegations. The jury's verdict confirmed the defense position and resulted in a complete victory for the client.

FEDERAL COURT GRANTS SUMMARY JUDGMENT IN FAVOR OF OFFICERS AND CITY

David Jadon successfully obtained summary judgment in favor of two city officers and the city in the United States District Court. Plaintiff claimed he was protesting on a public sidewalk and was issued a trespass warning in retaliation by a city officer. Plaintiff brought several claims, including First Amendment retaliation, conspiracy, and a Fourteenth Amendment Due Process claim against the City, alleging he had no mechanism to challenge the trespass warning.

However, the Plaintiff was actually standing outside of an event center during an ongoing event, which was owned and operated by a separate municipality and its private contractors. Moreover, when an event was ongoing, the event was reserved for the use of the event organizer and its attendees. The private contractors requested the trespass warning in part due to the disturbance the Plaintiff was causing.

Mr. Jadon successfully argued that the area the Plaintiff was standing in was not a "traditional public forum" but a private or "nonpublic" forum. As a result, all the Officer needed was "reasonableness," and a request from a private employee who managed the event center to trespass the Plaintiff was certainly reasonable. The Court also disposed of the conspiracy claims against each Officer.

The Due Process claim against the City was also thrown out. Because the Court concluded the Plaintiff was standing in a nonpublic forum, he did not have a constitutionally protected liberty interest to remain where he was. However, even if he could show a protected liberty interest to remain on the property, the Court noted that the Plaintiff still did not show constitutionally inadequate process. Mr. Jadon successfully argued that the Plaintiff did not show that there were inadequate state remedies. The Court agreed, and noted that Plaintiff could have attempted to challenge his trespass warning in state court.

FIRM SUCCESS

SUMMARY JUDGMENT IN CIVIL RIGHTS CASE IN FAVOR OF A LOCAL MUNICIPALITY

Ramon Vazquez recently obtained a summary judgment in favor of the Defendant, a local municipality, in a lawsuit filed by the Personal Representative of a person suspected of domestic battery who fled from a law enforcement officer; once the officer caught up with the suspect, he actively resisted the officer, made what was perceived by the officer as a furtive movement, and was shot and killed during the encounter. The underlying Complaint included *Monell* claims for the municipality's alleged deliberate indifference in training. The U.S. District Judge granted summary judgment in favor of the governmental entity.

FEDERAL COURT GRANTS DISMISSAL IN FAVOR OF OFFICER

David Jadon successfully obtained a complete dismissal in favor of a city officer in the United States District Court. Plaintiff claimed that while on probation, he shared a video online calling for a protest at a local elementary school. According to the Plaintiff, the city officer saw the video online and forwarded it to the Plaintiff's probation officer. The probation officer believed it to be a violation of Plaintiff's probation and submitted a warrant affidavit to the state court judge, who issued a warrant for Plaintiff's arrest. Plaintiff later pled guilty to a violation of his probation. Plaintiff sued and brought a First Amendment retaliation claim against the city officer.

Mr. Jadon successfully argued that because the Plaintiff was on probation, his speech was not constitutionally protected and his claim was barred as a collateral attack on his conviction under *Heck v. Humphrey*. Plaintiff had pled guilty to violating the terms of his probation, and as the Court recognized, this was a concession that the "state had a lawful basis to penalize his conduct." Finally, even if the Plaintiff could get around his state-court admission, the Court recognized that qualified immunity on behalf of the city officer was still appropriate.

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