Filing # 230477647 E-Filed 08/28/2025 04:38:08 PM

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL
CIRCUIT IN AND FOR PINELLAS COUNTY, FLORIDA
CIVIL DIVISION

RONICCA WHALEY,

Plaintiff,

v.

CITY OF ST. PETERSBURG,

Defendant.

Case No.
25-004025-CI

MOTION FOR LEAVE TO INTERVENE BY THE PROGRESSIVE PEOPLE'S ACTION

Progressive People's Action ("Intervenor" or "PPA"), by and through its undersigned counsel, respectfully requests leave to intervene in this matter pursuant to Rule 1.230 of the Florida Rules of Civil Procedure. In support of its motion to intervene, Intervenor states as follows:

1. Sleep is required for humans to survive.

2. All humans must sleep at some time and at some place.

3. On July 25, 2025, Plaintiff Ronicca Whaley filed a lawsuit against the City of St. Petersburg pursuant to § 125.0231(4), Fla. Stat. (2024). In her complaint, Plaintiff alleges the City of St. Petersburg has failed to take any action "to prevent people from sleeping or camping in and around Williams Park" in downtown St. Petersburg. Compl. ¶ 27.

4. Plaintiff also alleges that the City has failed to take all reasonable actions to comply with § 125.0231(4) "by not removing or prohibiting individuals from sleeping or camping overnight on public property." Compl. ¶ 37.

5. According to Plaintiff, the City's lack of enforcement of camping ordinances undermines the "aesthetic integrity of the community." Compl. ¶ 38.

6. Plaintiff asks this Court for both a temporary and permanent mandatory injunction to compel "Defendant to enforce § 125.0231 by prohibiting and removing individuals engaged in overnight sleeping and camping in/on public property." Compl. at 9.

7. Plaintiff's request to this Court to prohibit and "remove" individuals from sleeping on public property, *id.*, is an unlawful and unconstitutional form of relief. Additionally, prohibiting individuals from sleeping on public property and "removing" them from public spaces will not end homelessness in the City. *Id.* at ¶ 37. Instead, it will simply make it harder for individuals experiencing homelessness to find stable housing.

8. Section 125.0231 does not require the City to criminalize camping or people who engage in it. The City could comply with the statute by providing people experiencing homelessness with other alternatives to sleeping outdoors such as access to housing and other related services.

9. The best way to achieve public safety is not to criminalize sleeping and punish or banish those who engage in it. Rather, public safety is achievable through providing housing. Housing makes everyone and our community safer.

10. Intervenor Progressive People's Action respectfully moves this Court to allow it to intervene so the Court can consider the interests of those who are impacted most by this litigation: those experiencing homelessness in the City of St. Petersburg.

11. The purpose of this Motion to Intervene by Progressive People's Action (PPA) is to represent the interests and protect the constitutional rights of every St. Petersburg resident who is forced to sleep outside because they lack viable, alternative options.

12. Intervenor will raise important issues of concern to this Court on behalf of St. Petersburg residents that are not currently represented by either the Plaintiff or the City of St. Petersburg.

13. Intervenor will advocate for an interpretation of the statute that respects the constitutional rights of individuals experiencing homelessness who have no choice but to sleep outdoors in public places due to lack of adequate alternatives.

14. Intervenors will advocate for appropriate relief that does not include increased enforcement of punitive measures against people experiencing homelessness in St. Petersburg for simply sleeping, something we all must do to live and survive. Instead, Intervenors will argue that the reasonable way to ensure that people are not regularly camping or sleeping is to provide adequate alternatives to sleeping outdoors such as housing and other related services.

15. Intervenor PPA is a local, Pinellas-County based mutual-aid organization. It is incorporated in St. Petersburg, Florida. PPA's mission is to build a network of people, organizations, unions, and communities to provide immediate, material support for the most vulnerable people in the community, namely people experiencing homelessness and poverty in Pinellas County. PPA strives to support individuals who are experiencing homelessness and poverty by preventing needless suffering through collective action, fulfilling individuals' immediate material and medical needs, and creating a living network of mutual aid and solidarity to ensure the safety of those who are unhoused. PPA works intimately with community members experiencing homelessness and provides essential care, resources, and materials to individuals through its community free store, harm reduction work, and community organizing. PPA is well situated to represent the interests of St. Petersburg's unhoused residents. *See* Declaration of Jake Geffon, Representative of Progressive People's

Action (Exhibit A).

Background

16. An individual or family is considered "homeless" under Florida law if they "lack[] a fixed, regular, and adequate nighttime residence." § 420.621(5)(a), Fla. Stat. (2024) (incorporating by reference definition of "homeless" in 24 C.F.R. § 578.3). By definition, a homeless individual or family that lacks a regular nighttime residence may instead be forced to use a car, park, abandoned building, or other "place not designed for or ordinarily used as a regular sleeping accommodation for human beings" as their "primary nighttime residence." 24 C.F.R. § 578.3.

17. Pinellas County's 2025 Point in Time Count (PIT Count) found that there are 1,863 individuals experiencing homelessness in the county.[1] Of those, 1,325 are sheltered and 538 are unsheltered.[2]

18. Pinellas County's 2025 PIT Count found that there were 271 unsheltered individuals living in St. Petersburg, which is 50.3% of unsheltered individuals in Pinellas County. [3]

19. While Pinellas County recorded a decrease in unsheltered homelessness, "[r]eports from individuals with lived experience also suggest increased fear of law enforcement related to recent anti-camping legislation, which may have contributed to greater concealment and avoidance during the count."[4]

20. The Pinellas County PIT Count's heat map of unsheltered individuals indicates

[1] *See* T. Freeman Gerhardt, 2025 Point In Time Count: Pinellas County, Florida, 85 (2025), https://static1.squarespace.com/static/65d4ff9b614a1b3c3047a260/t/687540d348db533191ae9e10/1752514780552/2025+Pinellas+Point+in+Time+-+PIT+-+Report.pdf
[2] *Id.* at 7.
[3] *Id.* at 51.
[4] *Id.* at 85.

a high concentration of individuals in and around downtown St. Petersburg.[5] The highest concentration of individuals—38.48% of unsheltered individuals in the County—are located in the 33701 and 33705 zip codes.[6]

21. The primary causes of homelessness in Pinellas County are financial hardship or job loss (40%), medical issues (20%), family issues (14%), eviction or foreclosure (10%), and natural disasters (8%).[7]

22. Pinellas County's PIT Count also found that 253 people experiencing homelessness in the county are veterans of the U.S. military,[8] 189 people are survivors of domestic abuse,[9] and 38% of the homeless population are Black or African American, even though Black or African American individuals make up only 11% of the Pinellas County population.[10]

23. In 2024, the Florida Legislature enacted House Bill 1365, codified at § 125.0231, Fla. Stat. (2024), entitled "Public Camping and Public Sleeping."

24. The statute mandates that "[e]xcept as provided in [§ 125.0231(3)], a county or municipality may not authorize or otherwise allow any person to regularly engage in public camping or sleeping on any public property." § 125.0231(2), Fla. Stat. (2024).

25. "Public camping or sleeping" means:

> a. Lodging or residing overnight in a temporary outdoor habitation used as a dwelling or living space and evidenced by the erection of a tent or other temporary shelter, the presence of bedding or pillows, or the storage of personal belongings; or b. Lodging or residing overnight in an outdoor

[5] *Id.* at 49.
[6] *Id.* at 50.
[7] 2025 Pinellas Point In Time (PIT) Report Overview, Pinellas Continuum of Care, (2025) https://static1.squarespace.com/static/65d4ff9b614a1b3c3047a260/t/688901cb92fa570e05c91618/1753809355068/2025+Pinellas+Point+in+Time+-+PIT+-+Report+Overview.pdf.
[8] *Id.*
[9] *Id.*
[10] *Id.*

space without a tent or other temporary shelter.

Id. at (1)(b)(1).

26. To enforce the statute, the legislature created a private right of action that allows any "resident of the county, an owner of a business located in the county, or the Attorney General" to bring a civil action against a county or applicable municipality to enjoin a violation of the statute. § 125.0231(4)(a).

27. The law went into effect on October 1, 2024. The enforcement provision of the statute, § 125.0231(4), went into effect on January 1, 2025.

28. On November 7, 2024, the City of St. Petersburg amended its sleeping and camping ordinance to incorporate by reference the new state law, "Ordinance 596-H," (amending St. Petersburg, Fla., Mun. Code § 20-74 (2024)).[11] The text of the ordinance makes it unlawful to "1) Sleep in or on (i) any part of the right-of-way, which shall include any public sidewalk, or (ii) any public path for vehicular or pedestrian travel within the municipal pier district; or, (2) Engage in public camping as defined by F.S. § 125.0231."[12]

29. The City has a policy of enforcing this ordinance (along with other City ordinances that prohibit sleeping or camping). Def.'s Mot. to Dismiss (8/19/2025), Exs. A (Affidavit of Chief of Police Anthony Holloway) & B (Affidavit of Lieutenant Thomas Qualey).

Intervenor Will Not Inject New Issues into This Litigation, but Will Raise Important Arguments for the Court to Consider.

30. Permitting intervention will not delay or disrupt the proceedings, as this case is

[11] City of St. Petersburg Council Meeting Agenda (Nov. 7, 2024), https://acrobat.adobe.com/id/urn:aaid:sc:VA6C2:b74dccb4-11fb-449d-9d95-979ba5eb2541.

[12] St. Petersburg, Fla., Mun. Code § 20-74 (2024), https://library.municode.com/fl/st._petersburg/codes/code_of_ordinances?nodeId=PTIISTPECO_CH20OFMIPR_ARTIVOFINPUPEOR_DIV1GE_S20-74SLRI-W.

in the early stages of litigation, and Intervenor has no intention of injecting new issues into this litigation. Rather, Intervenor simply seeks to ensure that the Court can consider the interests of St. Petersburg residents who are experiencing homelessness and are forced to sleep outside in public spaces because they have no other viable, alternative options to engage in the life-sustaining conduct of sleeping.

31. If permitted to intervene, Intervenor will demonstrate that Plaintiff's argument is predicated on an incorrect understanding of the facts and state law—namely, § 125.0231—and an unfamiliarity with the protections of the state and federal constitutions. The relief that Plaintiff requests is not only inhumane and unreasonable, but also unconstitutional.

32. If the statute is interpreted to outlaw sleeping for homeless individuals even when they have no alternative places to sleep, this implicates their fundamental rights guaranteed by the Fourteenth Amendment of the U.S. Constitution's substantive due process and equal protection clauses. *McArdle v. City of Ocala*, 418 F. Supp. 3d 1004, 1008 (M.D. Fla. 2019) (denying defendant's motion to dismiss because complaint plausibly alleges that the city's enforcement of its open lodging ordinance against homeless residents when there were no alternative places to sleep violates the substantive due process and equal protection provisions of the Constitution); *see also McArdle v. City of Ocala*, 519 F. Supp. 3d 1045, 1053, 1055 (M.D. Fla. 2021) (denying Defendant's motion for summary judgment on substantive due process and equal protection claims for enforcement of open lodging ordinance when shelter space is unavailable).

33. Plaintiff asks this Court for a wholly inappropriate and unlawful outcome: a ruling requiring that the City of St. Petersburg arrest or forcibly relocate individuals for sleeping. *See, e.g.*, *State v. Penley*, 276 So. 2d 180, 181 (Fla. 2d DCA 1973) (St. Petersburg

ordinance prohibiting sleeping in public places was unconstitutional for permitting the "punishment of unoffending behavior").

34. Plaintiff's claims rest on an erroneous and improper construction of Florida law and basic constitutional guarantees.

35. Plaintiff also alleges facts that are irrelevant to homelessness and sleeping, thus making a false and biased connection between homelessness and criminal activity. In her Complaint, Plaintiff lists various noncriminal and criminal activities, such as digging through trash, making verbal insults, and urinating in public, that are wholly unrelated activities to the innocuous and life-sustaining act of sleeping. Compl. ¶¶ 2, 8, 11–14, 15–19. This conduct is (and has been) readily addressed by other municipal ordinances and Florida's criminal statutes. Plaintiff presents these instances of unrelated activities as reasons for why this Court must order the City to punish individuals who are sleeping, thus improperly conflating poverty with criminality.

Progressive People's Action Meets the Requirements for Intervention Under Florida Rule of Civil Procedure 1.230.

36. Pursuant to Rule 1.230 of the Florida Rules of Civil Procedure, "[a]nyone claiming an interest in pending litigation may at any time be permitted to assert a right by intervention, but the intervention shall be in subordination to, and in recognition of, the propriety of the main proceeding, unless otherwise ordered by the court in its discretion." Fla. R. Civ. P. 1.230.

37. To satisfy Rule 1.230, an intervenor must have an interest "of such a direct and immediate character that the intervenor will either gain or lose by the direct legal operation and effect of the judgment." *Nat'l Wildlife Fed'n Inc. v. Glisson*, 531 So. 2d 996, 997 (Fla. 1st DCA 1988) (citation omitted). "Intervention should be liberally allowed." *Id.* at 998.

A. Progressive People's Action Has Direct and Immediate Interests in This Litigation.

38. This litigation impacts core interests of Intervenor. PPA is a not-for-profit corporation in Florida. PPA is a community-run mutual aid organization committed to justice and advocating for and serving those who experience homelessness in the City of St. Petersburg and Pinellas County. *See* Ex. A, ¶¶ 1, 4. As PPA describes it, mutual aid is a practice in which people organize to meet each other's basic needs. PPA practices "solidarity, not charity", meaning PPA recognizes that our collective liberation is dependent on the freedom of all, including those experiencing poverty and homelessness. *Id.* at ¶ 10. PPA seeks to address the root causes of homelessness by an oppressive system through solidarity. *Id.* PPA runs a free store, which provides canned goods, nonperishable food items, water, clothes, shoes, first aid supplies, and hygienic products to those in the community who need it, primarily those experiencing homelessness and poverty. *Id.* at ¶ 13. Any donations made to PPA go directly to community members in need. PPA also focuses its work on harm reduction and taking care of those suffering the most in Pinellas County. *Id.* at ¶ 16.

39. Given PPA's involvement with persons experiencing homelessness and poverty, PPA has a direct and immediate interest in this lawsuit. PPA represents the interests of those experiencing poverty and homelessness in Pinellas County, whose rights will be directly impacted by the Court's decision in this lawsuit. There is nothing more direct and immediate than being unable to carry out one's very mission and purpose.

40. In recognition of the unique interests served by community organizations, courts have granted motions to intervene in lawsuits when the Court's ruling will have an impact on the community which the intervenor organization serves. *See, e.g.*, *Nat'l Wildlife Fed'n Inc.*, 531 So. 2d at 996 (community organization had "interest of such a direct and immediate

character that they would either gain or lose by the direct legal operation of the judgment"); *Sierra Club v. Brown*, 243 So. 3d 903, 905–06 (Fla. 2018) (nonprofit organization Sierra Club was one of 9 intervenors challenging rate changes by Florida Public Service Commission); *Browning v. Fla. Hometown Democracy, Inc., PAC*, 29 So. 3d 1053, 1062 (Fla. 2010) (political action committee intervened as Defendants at trial court level); *League of Women Voters of Fla. v. Detzner*, 179 So. 3d 258, 272 n.5 (Fla. 2015), *abrogated by Black Voters Matter Capacity Bldg. Inst., Inc. v. Sec'y, Fla. Dep't of State*, No. SC2023-1671, 2025 WL 1982762 (Fla. July 17, 2025) (noting that Florida State Conference of NAACP Branches intervened in prior stage of litigation).

41. The interests of individuals experiencing homelessness should also be recognized as a proper basis for intervention here. *Cf. La All. for Hum. Rts. v. City of Los Angeles*, No. 20-02291-DOC, 2020 WL 13586046, at *3 (C.D. Cal. Mar. 18, 2020) (granting motion to intervene in litigation by a soup kitchen and a membership organization that includes unsheltered persons because the intervenors "are the only party that represent the interests of unhoused persons" and the parties in the case cannot represent those interests).

B. No Party to This Litigation Can Adequately Represent the Interests of the Intervenor.

42. Because PPA's interests will not be adequately represented by either party, it is necessary to permit intervenors to join this action. *See, e.g.*, *Bay Park Towers Condo. Ass'n, Inc. v. H.J. Ross & Assocs.*, 503 So. 2d 1333, 1335 (Fla. 3d DCA 1987) (intervention necessary because interests "would not be adequately protected in the pending suit"); *Southland Life Ins. Co. v. Abelove*, 556 So. 2d 805, 806 (Fla. 5th DCA 1990) (condition to intervene is that intervenor's interests will not be fully protected by original party's suit). *But see Union Cent. Life Ins. Co. v. Carlisle*, 566 So. 2d 1335, 1337 (Fla. 4th DCA 1990) (no explicit requirement

that intervenor fear its interests will not be adequately protected, and that if such a requirement exists, "condition is fulfilled sub judice by the very fact of filing a complaint in intervention.").

43. Intervenor opposes the relief sought by Plaintiff for the reasons stated herein. Intervenor's interests are distinct from Ronnica Whaley's, a business owner with the goal of forcing the City to remove or involuntarily detain St. Petersburg residents experiencing homelessness from public spaces if they engage in the life-sustaining activity of sleeping. Defendant City of St. Petersburg also cannot fully represent the interest of Intervenor. The City of St. Petersburg has its own interests in defending the lawsuit, including asserting how it has been enforcing multiple City ordinances that prohibit camping or sleeping on public property. Def.'s Mot. to Dismiss, at 2, Exs. A (Affidavit of Chief of Police Anthony Holloway) & B (Affidavit of Lieutenant Thomas Qualey).

44. The City must also balance multiple interests in its defense, including private property and business owners in St. Petersburg, not all of whom align with the interests of the Intervenor. *See, e.g.*, *Troncoso v. Larrain*, 307 So. 3d 965, 967 (Fla. 3d DCA 2020) (explaining that "[w]here 'the party seeking to intervene has the same ultimate objective as a party to the suit, the existing party is presumed to adequately represent the party seeking to intervene unless that party demonstrates adversity of interest, collusion, or nonfeasance.'") (quoting *M2 Tech., Inc. v. M2 Software, Inc.*, 589 F. App'x 671, 675 (5th Cir. 2014)).

45. Without the Intervenor's participation, the other parties could elect to settle this case on terms that do not align with Intervenor's interests.[13] On the other hand, the Court could

[13] Although PPA is not required to establish that it has standing to sue in its own right to intervene, *see State v. Fla. Workers' Advocs.*, 167 So. 3d 500, 505 (Fla. 3d DCA 2015) (although association's indirect economic interest were sufficient to permit intervention, it lacked standing to continue with litigation after original plaintiff's claims were dismissed), PPA notes that it has standing to sue directly under § 125.0231(4)(A).

Fla. Stat. § 125.0231(4)(A) provides that "[a] resident of the county, an owner of a business located in the county, or the Attorney General may bring a civil action in any court of competent jurisdiction against the county or

potentially issue a ruling adverse to the Intervenor's interest without the benefit of arguments or evidence presented by Intervenor. Granting intervention here will ensure that all interested parties are given an opportunity to be heard and be an efficient use of judicial resources.

C. Intervenor's Motion Is Timely.

46. Intervenor's Motion to Intervene is timely. Plaintiff filed this litigation on July 25, 2025. Defendant filed its Motion to Dismiss, Response to Injunctive Relief, and Motion to Strike on August 19, 2025. The Court has not scheduled any court or hearing dates as of this filing. Intervenor moved to intervene on Thursday, August 28, within nine days of when Defendant filed its Motion to Dismiss. As this litigation is still in the early stages, granting Intervenor's Motion will not delay or disrupt this litigation, and the court should grant PPA's Motion to Intervene. *See, e.g.*, *Slaughter v. Est. of McPherson ex rel. Liebreich*, 779 So. 2d 374, 374 (Fla. 2d DCA 2000) (abuse of discretion to rule that motion to intervene was untimely where "pleadings in the underlying action had not been finalized, discovery was ongoing, and no trial date had been set."); *Hartford Fire Ins. Co. v. Sch. Bd. of Dade Cty.*, 661 So. 2d 111, 112 (Fla. 3d DCA 1995) ("Where the litigation is still in the pleading stage, and the intervenors assure the court that their participation will not delay or disrupt the proceedings, it is an abuse of discretion to deny the motion to intervene.").

47. For the foregoing reasons, PPA respectfully requests that this Court grant its

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applicable municipality to enjoin a violation of subsection (2)." In creating this broad standing requirement for bringing a civil action under § 125.0231, the Florida Legislature ensured that any resident of Pinellas County or business owner with a business in Pinellas County could sue the City of St. Petersburg for any alleged violation of the statute.

PPA is incorporated in St. Petersburg. Its members comprise of St. Petersburg and Pinellas County residents. Thus, individual members of PPA have a right to sue the City of St. Petersburg under § 125.0231(4)(A) in their own right. In the interest of judicial economy, however, PPA members will instead move collectively to intervene in this matter for the limited purpose of ensuring that the City and Court's interpretation of the statute honors the constitutional rights and inherent dignity of all of St. Petersburg's unhoused residents.

Motion to Intervene.

CERTIFICATE OF CONFERRAL

In accordance with Florida Rule of Civil Procedure 1.202, I certify that prior to filing this motion, I discussed the relief requested in this motion by phone with Counsel for the Plaintiff and by email with Counsel for the Defendant. Counsel for the Plaintiff and Defendant informed me that they oppose this Motion.

WE HEREBY CERTIFY that a true and correct copy of the foregoing was sent via E-Mail Service or via an automatic email generated by the Florida Courts E-Filing Portal to all parties on the attached Service List on this the 28th day of August, 2025.

Respectfully submitted,

/s/ Jacqueline Azis
Jacqueline Azis, Fla. Bar No. 101057
Kirsten Anderson, Fla. Bar No. 17179
Southern Poverty Law Center
2 S Biscayne Blvd, Ste 3750
Miami, FL 33131-1804
727-463-2110
Jacqueline.Azis@splcenter.org
Kirsten.anderson@splcenter.org

Micah West
Ala. Bar No. ASB-1842-J82F*
Ellen Degnan
Ala. Bar No. ASB-3244-I12V*
Southern Poverty Law Center
400 Washington Ave.
Montgomery, AL 36104
P: 334-314-8976
E: micah.west@splcenter.org
E: ellen.degnan@splcenter.org

** Pro hac vice application forthcoming*

Counsel for Intervenor

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been electronically filed with the Pinellas County Clerk of Court using the E-Filing Portal System and furnished by email on August 28, 2025, to:

Sanford Blaine Kinne
Fla. Bar No.: 1059365
5433 Central Avenue
St. Petersburg, Florida 33710
Primary Email: Blaine.kinne@webercrabb.com
Secondary Email:
Suzie.Whitaker@webercrabb.com
Attorney for Plaintiff

Joseph P. Patner
Fla. Bar No.: 831557
P.O. Box 2842
St. Petersburg, Florida 33731
Primary Email: eservice@stpete.org
Secondary Email: Joseph.Patner@stpete.org
Attorney for Defendant

/s/ Jacqueline Azis
Jacqueline Azis, Fla. Bar No. 101057
Southern Poverty Law Center
2 S Biscayne Blvd, Ste 3750
Miami, FL 33131-1804
727-463-2110
Jacqueline.Azis@splcenter.org
Attorney for Intervenor

Filing # 230477647 E-Filed 08/28/2025 04:38:08 PM

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Case No.
25-004025-CI

Exhibit A to Intervenor's Motion to Intervene

Declaration of Jake Geffon,
Progressive People's Action Representative

STATE OF FLORIDA
COUNTY OF PINELLAS

SWORN DECLARATION OF JAKE GEFFON, REPRESENTATIVE OF PROGRESSIVE PEOPLE'S ACTION

I, Jake Geffon, being of full age, hereby declare the following based on personal knowledge:

1. I am a resident of Pinellas County, Florida.
2. I am one of the lead organizers of Progressive People's Action ("PPA"). PPA is a local, Pinellas-County, Florida based mutual-aid, not-for-profit organization that is incorporated in St. Petersburg, Florida. Mutual aid is a practice in which people organize to meet each other's basic needs.
3. PPA's principal address is 6160 Central Avenue, Ste 300, St. Petersburg, FL 33707.
4. PPA was formed in 2020 to fill a gap in Pinellas County. We formed PPA to serve vulnerable and impoverished communities while advocating for those experiencing poverty and homelessness through unflinching solidarity, direct connections, and close relationships with the community PPA serves.
5. PPA's mission is to build a network of people, organizations, unions, and communities to provide immediate, material support for the most vulnerable people in the community, namely people experiencing homelessness and poverty in Pinellas County.
6. We have approximately 80 members and volunteers. Some of our members are residents of St. Petersburg. Some of our members are experiencing poverty, including in St. Petersburg.
7. PPA supports individuals who are experiencing homelessness and poverty by

preventing needless suffering through collective action, fulfilling individuals' immediate material and medical needs to the best of PPA's ability, and creating a living network of mutual aid and solidarity to ensure the safety of those who are unhoused.

8. PPA works intimately with community members experiencing homelessness and provides essential care, resources, and materials to individuals through its community free store, harm reduction work, and community organizing.
9. Through PPA's programs, PPA routinely encounters, assists, and works with unhoused residents of St. Petersburg who are struggling to find and get in emergency shelter space, and thus they must live and sleep on the streets of St. Petersburg. Many of PPA's free store patrons and members of the unhoused community that PPA works with have tried to obtain emergency shelter space and have been unable to.
10. PPA is committed to advocating with and serving those who experience homelessness in the City of St. Petersburg and Pinellas County. PPA seeks to address the root causes of homelessness by an oppressive system through "solidarity, not charity."
11. PPA believes that our collective liberation is dependent on the freedom of all, including those experiencing poverty and homelessness.
12. PPA believes that people experiencing poverty and homelessness deserve support and that people experiencing homelessness and poverty most powerfully tell the harsh realities of what life is like in our communities today, as poverty is widespread throughout the country, Florida, and Pinellas County. Politicians and

government officials should recognize the struggles that unhoused individuals are experiencing. PPA aims to validate the struggles of our unhoused neighbors, and PPA believes that people must work directly with our unhoused neighbors to understand the struggles that they face. PPA believes that political reform around homelessness requires direct contact and relationships with those experiencing homelessness.

13. PPA runs a free store, which provides water, canned goods and nonperishable food items, clothes, shoes, first aid supplies, over-the-counter medications, and hygienic products to those in the community who need it, primarily those experiencing homelessness and poverty. The free store also provides wound care when volunteer emergency medical technicians or nurses are available, as well as haircuts when volunteer barbers are available. PPA also provides free testing for HIV and sexually transmitted diseases. The free store operates once a month in St. Petersburg (the fourth Sunday of every month) and once a month in Kenneth City (the second Sunday of every month). PPA provides supplies to anywhere from 20-100 people experiencing homelessness every month through its free store.
14. In addition to providing free supplies and care at its free stores, PPA will also go out directly to people experiencing homelessness and poverty, ask them what supplies they need, and provide the supplies.
15. PPA also has a harm reduction program. PPA provides harm reduction supplies (NARCAN nasal spray, fentanyl test strips, and safe-use kits, emergency contraception) to those who need it in Pinellas County and across central Florida.

PPA distributes the supplies at and around large events, such as concerts and festivals. PPA provides harm reduction supplies to hundreds of people every month.

16. Any monetary or material donations made to PPA go directly to community members in need, specifically those experiencing homelessness or poverty.
17. PPA must work directly with those experiencing homelessness and poverty to achieve its mission of serving unhoused people, connect people with unhoused people to influence their beliefs, and provide testimony to the community about the experiences of the unhoused community.
18. PPA believes it is imperative for it to intervene in this lawsuit because of PPA's core mission: solidarity, not charity. It is our mission to stand with our unhoused neighbors in their fight for safety from a society that harms them.
19. If St. Petersburg residents who are experiencing homelessness are punished and expelled from the City, PPA will lose its ability to serve the unhoused community through its community free store, donations, and harm reduction services. PPA will also lose its ability to connect with unhoused community members, build relationships with them, and use those relationships to influence our advocacy work. Should the unhoused folk of St. Petersburg disappear, PPA would be unable to provide critical and lifesaving information around drug use and community care, and we would lose our ability to help these fellow human beings stay alive.
20. By intervening, PPA hopes to advocate for the constitutional rights of St. Petersburg residents who are experiencing homelessness, thus preventing any

harm to St. Petersburg's unhoused community that would result if Plaintiff got the relief she requested to prohibit or remove unhoused people from St. Petersburg for sleeping.

Under penalties of perjury, I declare that I have read the foregoing affidavit and that the facts stated in it are true.

Executed on Aug 22, 2025

Jake Geffon