

Bond Case Briefs

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BONDS - FLORIDA

Halifax Hospital Medical Center v. State

Supreme Court of Florida - April 18, 2019 - So.3d - 2019 WL 1716374

Special tax district sought validation of revenue bonds that it intended to issue for purpose of financing construction of hospital.

The Circuit Court denied complaint for bond validation. District appealed.

The Supreme Court of Florida held that:

- District's enabling act only authorized it to operate within geographic boundaries established for district, and
- Interlocal Act, authorizing entry into contracts for performance of service functions of public agencies, was not an independent source of authority for district to operate outside those boundaries.

Enabling act creating special tax district only authorized district to operate within the geographic boundaries established for the district and not outside the district; default presumption pursuant to statute governing special districts was that such district had limited geographic boundary, and enabling act provided for district to establish, construct, operate, and maintain health care facilities "for the use of the public of the district" and stated that maintenance of such facilities "in the district" was a public purpose and necessary for general welfare of residents of district.

Interlocal Act, authorizing entry into contracts for performance of service functions of public agencies, was not an independent source of authority for special tax district to establish and operate a hospital outside geographical boundary of district; by its terms, Act required that any power, privilege, or authority that agency committed to perform be one that agency could exercise in absence of an interlocal agreement.