



## **Message from the Clerk** **Sheryl Loesch**

It's hard to believe another year has come and gone. What's even harder to believe is that COVID is still in the news. In reflecting on the 2022 calendar year, I'd like to think of it in positive terms; however, that is far from the case where our Court is concerned. Sadly, we lost our wonderful and much-beloved

Judge Michael G. Williamson. Our Court family will be missing him for a very long time, but his memory and the impact he had on the Court will live on forever. We also had a number of our long-serving, dedicated Court staff decide to retire. Although we will certainly miss them as well, we are happy for them as they enter this new phase of life. On the bright side, we had investitures for two of our new Judges during 2022: Judge Robson and Judge Brown. So there was some happy news during the year!

On the staffing front, our caseload continued to decline throughout the year. Ordinarily, that would be an issue because, as you may or may not be aware, our caseload is a large factor in determining our staffing formula. However, since we had so many staff opt to retire by the end of the fiscal year (September 30, 2022), we are in good shape for the current fiscal year.

In other news, as Judge Delano mentioned in her message in the last edition of our newsletter, I attended the global conference of the International Association for Court Administration that was held in October in Helsinki, Finland. "IACA," as it is commonly known, is near and dear to my heart because I was one of the founding members of the association when it was formed back in 2004. For the past three years, I have served as IACA's President, which in and of itself is a daunting task—one made more daunting because of the challenges COVID presented.

IACA is known for its impressive international conferences, but for nearly three years, it was not able to hold one. The Helsinki conference was scheduled three times before it finally took place this past year. Although COVID did not impact the October conference, we had to contend with Russia's war on Ukraine and the fact that Finland shares a border with Russia. To say planning and conducting this conference was stressful is an understatement!

I would like to take this opportunity to brag about this wonderful association. IACA was formed to promote effective court management by cultivating the profession of

**Court Connection**  
**Volume No. 12 – Issue No. 1**  
**January 2023**

court administration around the world. It provides resource materials and educational programs, and it fosters collegiality, as well as compliments and reinforces efforts by governmental and non-governmental organizations to foster judicial reform and build justice-sector capacity. IACA also publishes two impressive publications: the *International Journal of Court Administration* (more of a scholarly, academic publication) and *The Court Administrator* (more of a “nuts and bolts” publication geared toward sharing best practices in the area of court administration.)

The theme of the Helsinki conference was “People Centered-Justice in the New Normal.” Some highlights from the conference included the President’s Welcome Reception, which was graciously hosted by the Mayor of Helsinki at City Hall. The opening plenary session on the topic of People-Centered Justice (PCJ) was moderated by Andrew Solomon, Senior Rule of Law Advisor, United States Agency for International Development (USAID), and it included a distinguished panel of subject-matter experts from around the World, including Hon. Zamirbek Bazarbekov, Chair of the Supreme Court of Kyrgyzstan; Hon. Ivan Michchenko, Justice of the Supreme Court of Ukraine and Member of the High Judicial Council; Hon. Albert Zogaj, Judge of the Supreme Court of Kosovo and Chair of the Kosovo Judicial Council; and Dr. Maurits Barendrecht, Program Director, The Hague Institute for Innovation of Law. The panel discussed working PCJ into their judicial systems.

Another distinguished plenary panel, which included Chief Justices from several countries discussing Judicial Modernization Around the World, featured Marc Giroux, Commissioner for Federal Judicial Affairs, Canada, and Interim Director and Senior General Counsel, Canadian Judicial Council. The panelists were Hon. Richard Wagner, P.C., Chief Justice of Canada, and Chairperson of the Canadian Judicial Council; Hon. Tatu Leppänen, President of the Supreme Court of Justice of Finland; Hon. Ivor Archie, Chief Justice of the Supreme Court of Trinidad and Tobago; and Hon. Loretta Rush, President of the Conference of Chief Justices of the United States.

Among the many impressive breakout sessions during the 2-1/2 day conference were several that included panelists from the judiciary in Ukraine that were especially moving. If I have piqued your interest in this association, and you are interested in learning more and possibly becoming involved, please visit IACA’s website at [www.iaca.ws](http://www.iaca.ws). You are also always welcome to contact me with any questions.

As we turn our attention to the year ahead, we look forward to the investitures of two more Judges: Judge Burgess and Judge Geyer. Our Court is fortunate to have such an impressive bench of jurists and Court staff who are ready to tackle whatever challenges the new year brings.

I hope everyone had a Happy Holiday season and a Happy New Year!



**IN MEMORIAM**  
**CHUCK KILCOYNE**  
**By: Hon. Caryl E. Delano, Chief**  
**Judge**

Chuck Kilcoyne, who served as the Tampa Division's Deputy-in-Charge from 1987 to 2015, died peacefully on October 29, 2022.

Chuck began his career with the United States Air Force in 1968 as a Legal Specialist in the Judge Advocate General's Office at MacDill Air Force Base. After Chuck retired from the Air Force in 1972, he went to work as a paralegal for Don Stichter, who was then a sole practitioner. Chuck worked with Don Stichter, and Don's partners and associates, in a number of successor law firms, now known as Stichter, Riedel, Blain, & Postler, P.A. Chuck always referred to Don Stichter as "the Boss."

Judge Paskay recognized Chuck's leadership skills and, in 1987, encouraged him to apply for the Deputy-in-Charge position in Tampa. Beginning on December 6, 1987, Chuck managed the Tampa Division for 27 years until he retired in August 2015. During his tenure, Chuck supervised almost 100 Clerk's Office employees. He oversaw many changes at the Court, including the Court's move from a private office building on Memorial Highway to the Sam M. Gibbons U.S. Courthouse; the transition from paper files (remember the on-site copy service?) to CM/ECF; and the growth of the Tampa Division from a single-judge court to a four-judge court.

Chuck served under five chief judges: Judges Paskay, Proctor, Baynes, Glenn, and Jennemann. And he helped six new judges transition from practicing lawyers to sitting bankruptcy judges: Judges Baynes, Corcoran, Glenn, Williamson, May, McEwen, and Delano. The new judges soon learned who was "boss" in the Tampa courthouse. We will always be grateful to him.

After his retirement, Chuck volunteered for the Tampa Bay Bankruptcy Bar Association Pro Bono Clinic and served as a chaplain for the American Legion. Chuck is survived by his wife Debbie; son Jeff; Jeff's wife, Stephanie Polo; and two grandchildren, Naia and Cayman.



**Hon. Jeffery P. Hopkins Appointed to  
United States District Court, Southern  
District of Ohio**

**By: Hon. Caryl E. Delano, Chief Judge**

The judges of the Middle District congratulate our colleague, Judge Jeffery P. Hopkins, on his appointment as United State District Judge for the Southern District of Ohio! Judge Hopkins, who was appointed as a United States Bankruptcy Judge for the Southern District of Ohio in 1996, served as a visiting judge in the Fort Myers Division from July 2011 through June 2012. During that year, Judge Hopkins, while maintaining a full caseload in Ohio, traveled to Fort Myers each month and, together with Judge Barry S. Schermer (Eastern District of Missouri), presided over one of the heaviest post-recession caseloads in the country. President Joe Biden nominated Judge Hopkins as a District Judge, and the United States Senate confirmed the nomination in December 2022. For the full press release from the United States Bankruptcy Court for the Southern District of Ohio, please click [here](#).

*Congratulations!*

## Judge McEwen Swears In Former Intern

On December 16, 2022, Judge McEwen administered the Oath of Admission to The Florida Bar to Krystle Cacci.



Krystle had spent time as a Federal Judicial Graduate Extern with Judge McEwen before going on to become a Senior Attorney of the Appellate Division and Assistant Director of Pro Bono Operations with the Statewide Guardian ad Litem Office.

The swearing-in was attended by her mother, Simone Marsteller, retired state appellate judge, who held the Bible upon which Krystle placed her right hand to take the Oath of Admission.

Many other family members and friends attended, both in person and virtually via Zoom (yet another way Zoom has improved our lives).

Please join us in welcoming Krystle to the Florida Bar.



**Upcoming Events in the Middle District**  
**March - April 2023**

- March 9  
12:00 p.m.      **CFBLA, OCBA Bankruptcy Committee, and JBBA  
Joint CLE Program**  
“State of the District” presented by Chief Judge Delano  
*Zoom*
- March 14  
12:00 p.m.      **TBBBA CLE Luncheon**  
“A Deep Dive Into Metadata”  
*University Club, Tampa, and Zoom*
- March 17  
3:00 p.m.      **Investiture of Hon. Tiffany P. Geyer**  
*George C. Young Federal Courthouse, Orlando*
- March 23  
12:00 p.m.      **SWFLBPA CLE Luncheon**  
“State of the District” presented by Chief Judge Delano  
*Jury Assembly Room, U.S. Courthouse, Fort Myers*
- March 23  
6:00 p.m.      **SWFLBPA Annual Judge Alexander Paskay Dinner**  
*Pinchers, The Marina at Edison Ford, Fort Myers*
- March 28  
12:00 p.m.      **OCBA Bankruptcy Committee CLE**  
“Discharging Taxes in Bankruptcy – Avoid Malpractice and  
Make More Money Doing It!”  
*Orange County Bar Association Meeting Center, Orlando*
- March 30  
12:00 p.m.      **Practices & Procedures – Bankruptcy Judges of the  
Jacksonville Division of the Middle District of Florida**  
*Webinar*

**Court Connection**  
**Volume No. 12 – Issue No. 1**  
**January 2023**

- April 3  
4:00 p.m.                    **Roadways to the Bench: Who Me? A Bankruptcy or  
Magistrate Judge? A National Diversity Event**  
*George C. Young Federal Annex Courthouse, Orlando*  
*Chester H. Ferguson Law Center, Tampa*
- April 4  
12:00 p.m.                    **TBBBA Consumer Lunch**  
Featuring Chief Judge Caryl E. Delano  
*Zoom*
- April 11  
12:00 p.m.                    **TBBBA CLE Luncheon**  
*University Club, Tampa, and Zoom*
- April 19  
4:00 p.m.                    **Practices & Procedures – Bankruptcy Judges of the  
Orlando Division of the Middle District of Florida**  
*Webinar*





**JACKSONVILLE BANKRUPTCY BAR  
ASSOCIATION**

**By: Amy Leitch, Esquire – Akerman LLP**

**EVENTS, EVENTS, EVENTS!**

*Upcoming Luncheons*

The JBBA is partnering with Judge Burgess, Scott Bomkamp, and Gene Johnson (our Vice President!) to host a lunch-and-learn. The topic will be Merchant Cash Advance (MCA) lenders, and our esteemed panelists will delve into recent case law developments involving MCA lenders and preference claims. Be on the lookout for emails about the date for this lunch-and-learn and about future lunch-and-learns and other gatherings at the River Club.

*Save the Date - JBBA's Annual Seminar on August 11, 2023*

The 2022 annual JBBA Seminar will be held on August 11, 2023. Please mark your calendars! This conference brings together leading jurists, experts, and bankruptcy practitioners. The seminar always begins with one of the most highly anticipated events of the year: the "Recent Case Updates" morning session featuring a panel of judges analyzing cutting-edge bankruptcy topics across the district and nationwide. We're pleased to report that all our bankruptcy judges from the Middle District and Northern District are slated to participate this year!

*Past Events*

**January 24, 2023 – Brown Bag Lunch with Judge Brown**

Coming off a great November brown bag luncheon with Judge Burgess (thank you, Judge Burgess!), the JBBA hosted a brown bag luncheon with Judge Brown on January 24, 2023. Spots filled up quickly for the luncheon, which was well attended.



### **Judge Burgess' Investiture**

The Jacksonville Bankruptcy Bar Association was busy preparing for Judge Burgess' Investiture, which was held on February 2, 2023. It was great to see friends and colleagues at the ceremony and reception!

### **Other Events**

Thank you to our members for the great turnouts at the cocktail party, which was jointly hosted with the TMA, aboard the USS Orleck; our last Judicial Liaison Committee; and the JBBA Holiday Party!



**ORANGE COUNTY BAR ASSOCIATION  
BANKRUPTCY COMMITTEE**  
By: Kateryna V. Vykhodets, Tejes Law, PLLC

The OCBA Bankruptcy Committee has started 2023 strong.

On February 28, 2023, the OCBA hosted a virtual CLE—*Making the Most of Your Appraiser Expert Witness*. The speaker, Megan J. Ludd, is the President of Metropolis Real Estate Solutions, LLC, a full-service sales and valuation firm in Orlando, FL. As an appraiser for over 27 years and a lifelong resident of Central Florida, Ms. Ludd has developed an understanding of what drives decision-making when it comes to real estate.

Ms. Ludd presented clear and actionable tips for finding the best expert witness for your case, boosting your own knowledge of appraisal practice, using the tools provided by your expert witness to secure a win, and supporting your expert witness by highlighting their skill and experience.

On March 28, 2023, the OCBA will host an in-person CLE—*Discharging Taxes in Bankruptcy: Avoid Malpractice and Make More Money Doing It!*—at 12:00 p.m. at the Orange County Bar Association Meeting Center, 880 North Orange Avenue, Orlando. This event is presented by nationally recognized tax and bankruptcy attorney Larry Heinkel, creator of the Tax Discharge Determinator ([www.TaxDischargeDeterminator.com](http://www.TaxDischargeDeterminator.com)) and frequent nationwide speaker on this topic.

Attorney Heinkel will outline a step-by-step primer on when or whether taxes are dischargeable, provide insightful tips on what to do until they are discharged, explain what taxes are secured vs. unsecured, and explain how to charge additional fees for this work.

Attendees can register for these programs through the OCBA Member Portal.



**The TBBBA Wins Grants for Pro Bono  
Legal Service and the C.A.R.E. Program**  
By: Barbara A. Hart, Esquire - Stichter, Riedel, Blain &  
Postler, P.A.

In tribute to our mentor, friend, and first president, Don Stichter, the TBBBA has focused much of its attention this year on improving service to *pro se* parties and to our Tampa Bay community. To assist in financing our efforts, the TBBBA made grant funding requests of the Bankruptcy Law Education Series (BLES) Foundation to support our C.A.R.E. Program (chaired by Dan Etlinger) and of the American College of Bankruptcy Foundation (ACBF) to support our *Pro Se* Assistance Clinic (chaired by Michael Barnett). I am delighted to report that the TBBBA has received grant funding from both BLES and the ACBF.

**The C.A.R.E. Program-BLES Grant**

BLES awarded the TBBBA a generous grant to assist in our efforts to promote financial literacy in the Tampa Bay community. The Credit Abuse Resistance Education Program, or “C.A.R.E.” for short, is a national, nonprofit financial literacy organization. It was created in 2002 by retired bankruptcy judge, John C. Ninfo, II (U.S. Bankruptcy Court, Western District of New York), and blossomed into approximately fifty-five chapters nationwide, with dedicated chapter volunteers serving in over half the states, Washington D.C., and Puerto Rico.

At its core, C.A.R.E. provides an opportunity for volunteers to address middle school, high school, and college kids about the best practices and pitfalls regarding their credit in an attempt to start them off on the right path. Tampa’s C.A.R.E. Program got off to a robust start in 2007, but it recently went temporarily inactive because of the Covid-19 pandemic and other factors. Under the leadership of Dan Etlinger, Tampa has resumed its C.A.R.E. Program. So far this (fiscal) year, Tampa’s C.A.R.E. Program has reached over 365 students in six presentations, with many presentations still to come.

If you have a connection with a school or youth organization in the Tampa Bay area, the TBBBA would love an introduction. Or, if you are interested in becoming one of our presenters, we are happy to get you involved. In either case, please contact the TBBBA’s C.A.R.E. Program chair, Daniel Etlinger, at [detlinger@jennislaw.com](mailto:detlinger@jennislaw.com).

### **The *Pro Se* Service Clinic-ACBF Grant**

The TBBBA also applied for a grant from the ACBF to support its work in the *Pro Se* Assistance Clinic. While the ACBF was considering our grant application, we wasted no time and kept hard at work on other improvements in our efforts to aide *pro se* parties. This fiscal year, the TBBBA has:

- reopened the in-person clinic on Wednesdays from 2 – 4 p.m. in Room 964 (the Attorney Resource Room) on the 9<sup>th</sup> Floor of the Sam M. Gibbons United States Courthouse, 801 North Florida Avenue, Tampa, Florida;
- streamlined noticing procedures for whole-case or trial pro bono opportunities, enabling volunteers to locate and take on pro bono representation of their choosing;
- partnered with Judge Brown and Judge Burgess as they kickstart a new district-wide virtual pro bono assistance platform; and
- showed our appreciation to our invaluable pro bono service volunteers by recognizing them in news blasts, CLEs, *The Cramdown*, and with monthly gift card raffles.

All of this hard work was rewarded when, in mid-November 2022, the TBBBA received notice that the ACBF approved our grant application. The funding will allow us to update the technology in our *Pro Se* Assistance Clinic, provide professional interpreter support when needed, and defray the costs associated with administering, marketing, and supplying the *Pro Se* Assistance Clinic.

Please consider taking at least one pro bono case this year or donating just one hour of pro bono time each month. In-person opportunities are available in the TBBBA's *Pro Se* Assistance Clinic by emailing [tbbbaprobonoclinic@gmail.com](mailto:tbbbaprobonoclinic@gmail.com). Virtual opportunities are available by visiting the Middle District of Florida Bankruptcy *Pro Se* Assistance Clinic at <https://www.bankruptcyproseclinic.com/> and following the link and instructions to register as a volunteer.

If you come in to contact with an unrepresented party in a bankruptcy case that could benefit from a consult with an attorney, please consider sharing this information with them. If you have any questions, please contact the Middle District's clinic administrator at [info@bankruptcyproseclinic.com](mailto:info@bankruptcyproseclinic.com). We Love Our Pro Bono Volunteers!



**SOUTHWEST FLORIDA BANKRUPTCY  
PROFESSIONALS ASSOCIATION**  
**By: Jonathan M. Bierfeld, Esquire – Martin Law Firm**

I hope everyone had a safe and happy holiday and start to the New Year as we continue to recover from Hurricane Ian.

As many of you are aware, The Alexander L. Paskay Memorial Bankruptcy Seminar was held in Tampa from February 21 – 22 at the JW Marriot. Once again, this was one of the best—and most informative—events of the year, and the SWFLBPA was well-represented at the seminar in terms of attendees and panelists.

Speaking of Judge Paskay, we are beginning to plan our annual Alexander Paskay Dinner, which will be held on Thursday, March 23rd. Once we finalize a location for the dinner, I will send out an e-mail with more details.

Chief Judge Caryl E. Delano will be giving her annual “State of the District” presentation on Thursday, March 23rd. The presentation will be held at noon in the Federal Courthouse at the usual spot: the 2nd Floor Juror Selection Room. March 23rd is also a Chapter 7 and 13 hearing date; hearings that day will be held both in-person and over Zoom.

Looking forward to seeing everyone again soon.



**Case Law Update for Q1 2023**  
**Issue of the Court Connection**

**Editor:**

Bradley M. Saxton, Winderweedle, Haines, Ward & Woodman, P.A.

**Eleventh Circuit Cases**

***A&S Entertainment LLC v. Florida Dept. of Revenue (In re A&S Entertainment LLC)***

2022 WL 17752234 (11th Cir. Dec. 19, 2022)

The Eleventh Circuit affirmed the dismissal of an appeal based on a lack of appellate jurisdiction. The creditor filed a claim, which the chapter 11 debtor objected to. The bankruptcy court entered an order that allowed a sizable priority claim for the creditor. The debtor moved for reconsideration, which was denied. Rather than appeal then, the debtor waited for months (until after its plan was confirmed) to file an appeal. The Eleventh Circuit held that the earlier order was a final order that should have been appealed months earlier because it “settled and disposed of a discrete dispute—what was owed to the creditor—within the larger bankruptcy case.”

**Bankruptcy Court Cases**

***In re McCarthy***

2022 WL 5128113 (Bankr. M.D. Fla. Oct. 5, 2022) (Delano, C.J.)

Chief Judge Delano ruled that when a bankruptcy court initially had “related to” jurisdiction over a claim objection, the court has discretion to retain its jurisdiction even though subsequent events alter the jurisdictional analysis. The debtor filed for chapter 13 bankruptcy. So the court had “related to” jurisdiction over the debtor’s objection to a claim filed by a creditor. But the case was later converted to chapter 7 and administered as a no-asset case, which meant the claim objection would no longer have an effect on the

**Court Connection**  
**Volume No. 12 – Issue No. 1**  
**January 2023**

bankruptcy estate. Even so, Chief Judge Delano exercised her discretion to retain jurisdiction over the claim objection. Chief Judge Delano concluded that the following factors compelled retention of jurisdiction after conversion: (1) judicial economy; (2) fairness and convenience to the litigants; and (3) the degree of difficulty of the related legal issues.

***In re Adams***

2022 Bankr. LEXIS 2831 (Bankr. M.D. Fla. Oct. 6, 2022) (Delano, C.J.)

Chief Judge Delano ruled that a petitioning creditor was not qualified to file an involuntary chapter 7 case against the debtor because the petitioning creditor's claim was subject to a bona fide dispute. The petitioning creditor bought the debtor's property at a foreclosure sale. As it turned out, the foreclosure action, which was filed by a municipality, failed to name the debtor's mortgage lender. To stop the mortgage lender from foreclosing for nonpayment, the petitioning creditor paid the balance due on the mortgage. The petitioning creditor then filed an involuntary chapter 7 case and asserted a claim for the mortgage balance based on equitable subrogation. Finding that the debtor had not been unjustly enriched by the petitioning creditor's payment of the debtor's mortgage, Chief Judge Delano concluded that the petitioning creditor could not assert a claim for equitable subrogation. Nor did the petitioning creditor have a right to surplus funds from the foreclosure action. So Chief Judge Delano dismissed the involuntary case.

***In re Coleman***

2022 Bankr. LEXIS 2976 (Bankr. M.D. Fla. Oct. 13, 2022) (Geyer, J.)

Judge Geyer dismissed a chapter 13 case with prejudice and enjoined the debtor from filing for bankruptcy for two years. Although the debtor had filed two prior cases, Judge Geyer initially extended the automatic stay to the confirmation hearing. But Judge Geyer found the debtor's gamesmanship in filing a plan that lacked feasibility warranted dismissal and the imposition of the injunction.

***In re English***

Case No. 6:22-bk-01396-TPG (Bankr. M.D. Fla. Nov. 10, 2022) (Geyer, J.)

Judge Geyer denied a creditor's motion to extend the time to object to debtor's discharge. The debtor had agreed to an extension for the trustee to file an adversary proceeding to object to discharge, but the Court found no basis in this case to deviate from the general rule that an extension of the §727 or §523 deadline inures only to the benefit of the movant.



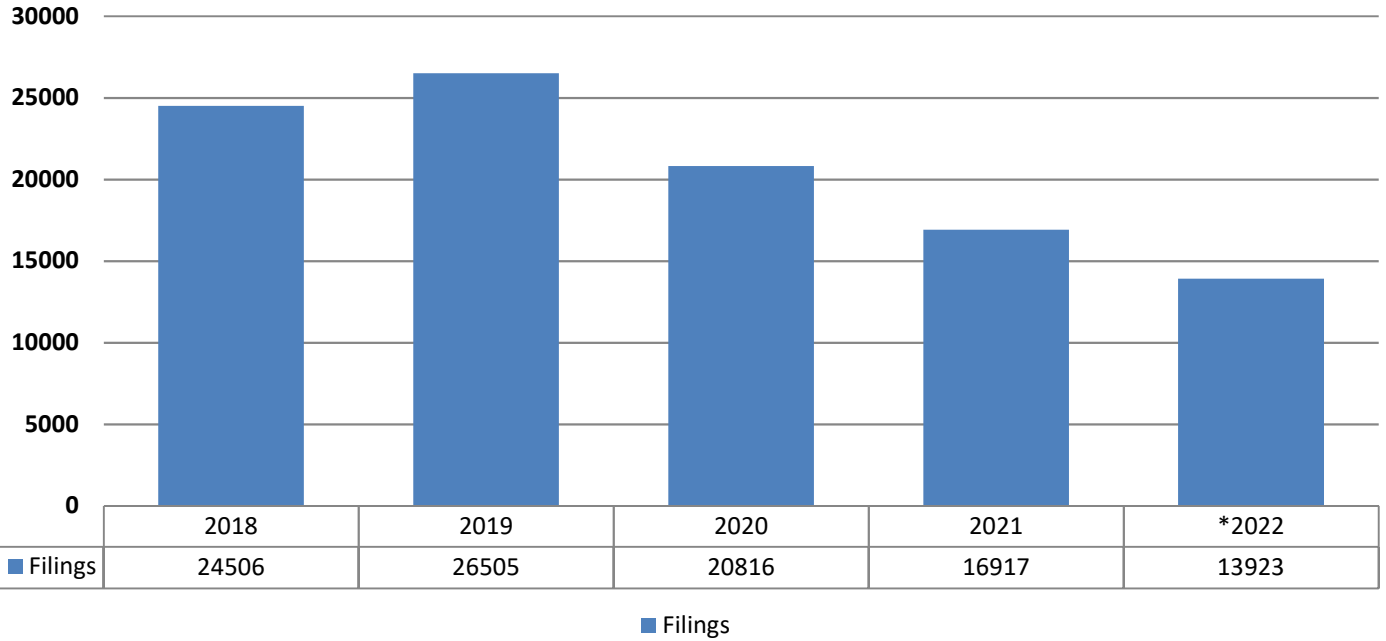
**Court Connection**  
**Volume No. 12 – Issue No. 1**  
**January 2023**

***Blue Capital Assets, LLC v. Doby (In re Doby)***  
2022 WL 18232723 (Bankr. M.D. Fla. Dec. 16, 2022) (Colton, J.)

Judge Colton ruled that debt was nondischargeable under 523(a)(2)(A) because the debtor falsely represented (and created the false impression) that he was a licensed contractor to perform construction repairs when in fact he was not a licensed contractor. After analyzing the facts and the credibility of the witnesses, Judge Colton found that the false representation was intended to deceive and that the creditor justifiably relied on the false representation. Judge Colton also found that the amount that should not be discharged in bankruptcy was the excess amount the creditor paid for the renovation work versus what the creditor would have paid to a licensed contractor.

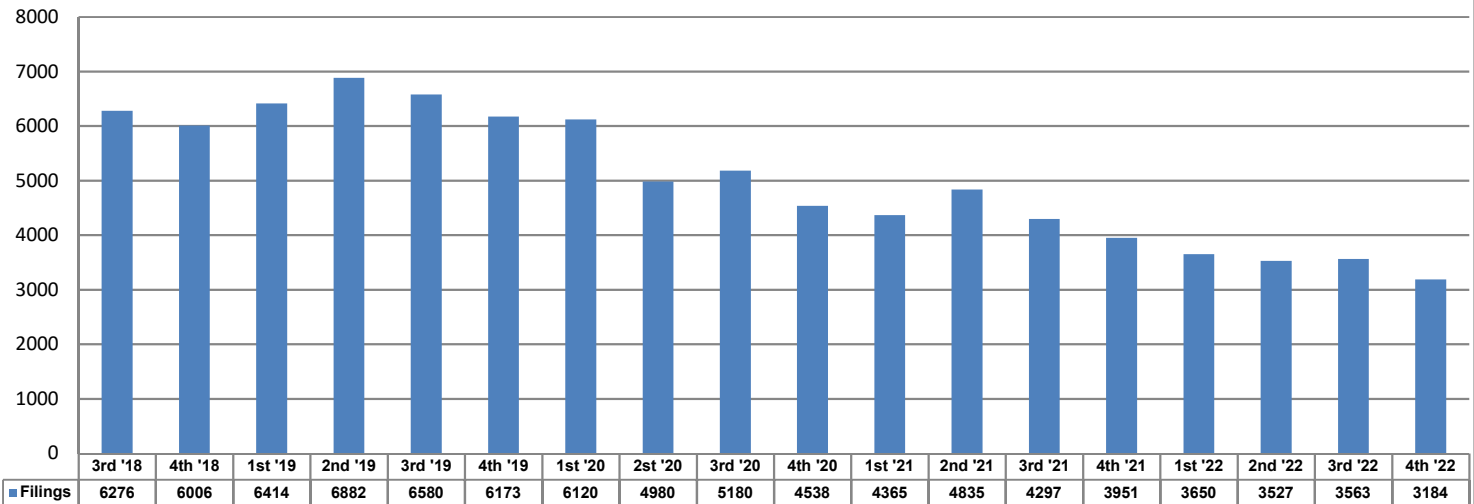
**United States Bankruptcy Court - Middle District of Florida**  
**Updated January 27, 2023 Meeting Data and Information**  
**Statistics as of December 31, 2022**

### Annual Filings

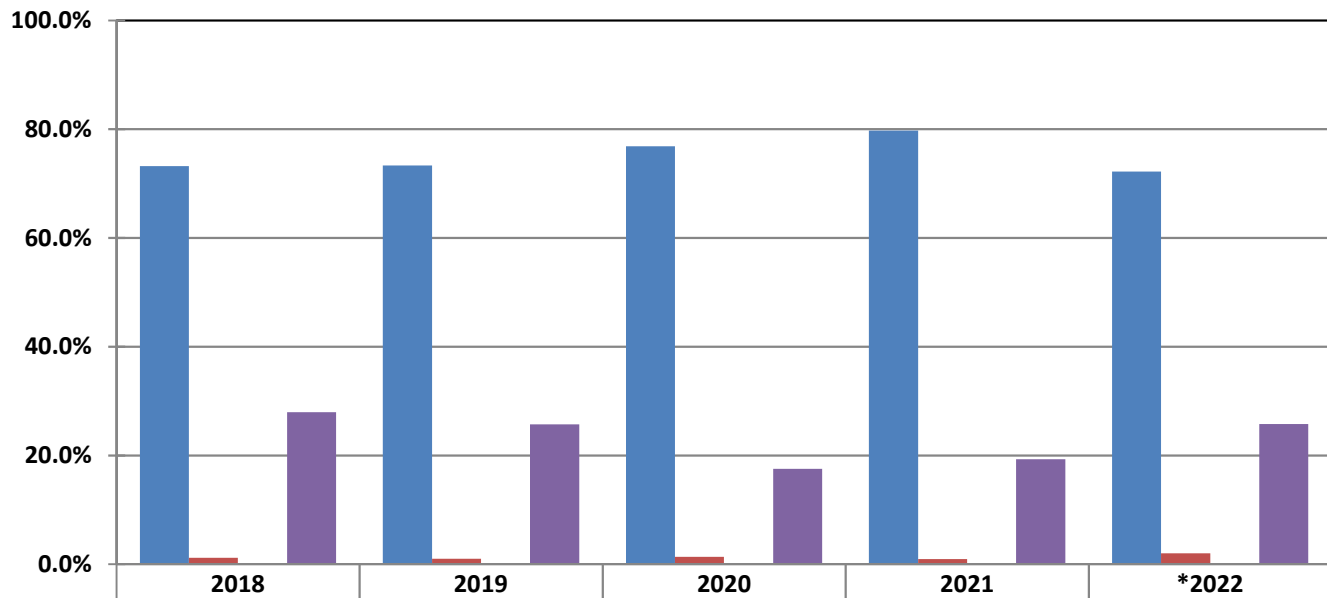


Year	Annual Filings	vs. 2015	vs. Prior Yr.
2018	24506		
2019	26505	8%	8%
2020	20816	-15%	-21%
2021	16917	-31%	-19%
*2022	13923	-43%	-18%

### Filings by Quarter

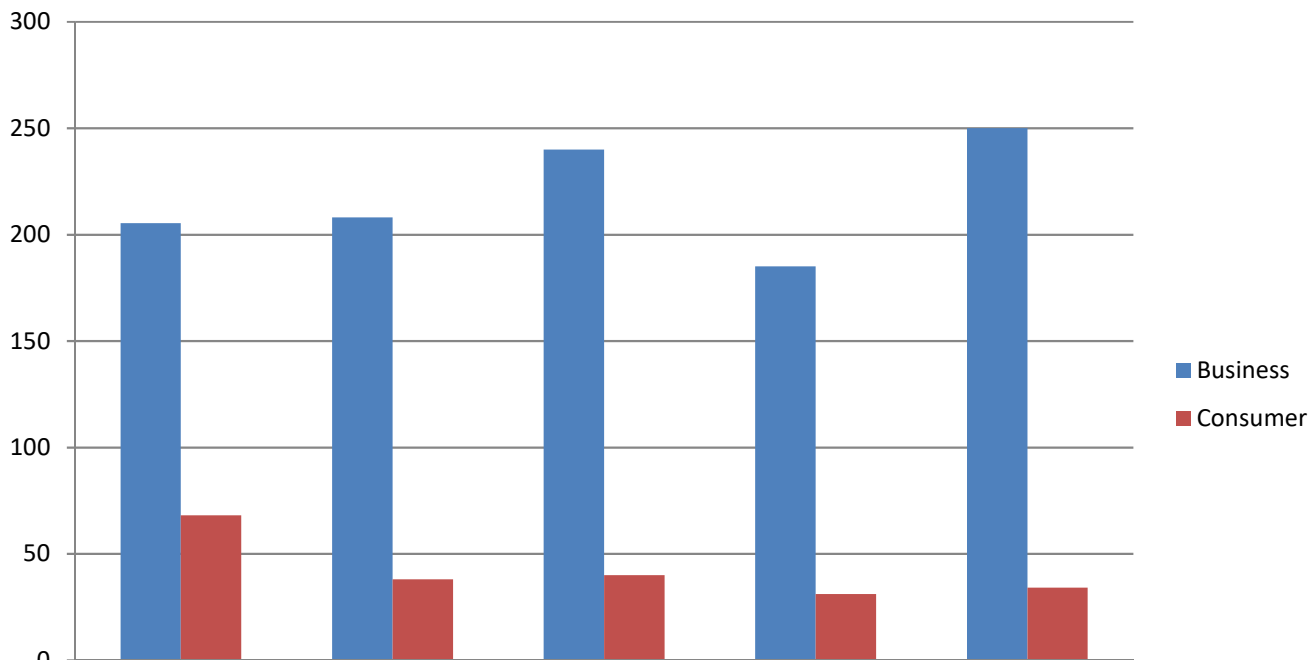


## Filings by % of Chapter Type



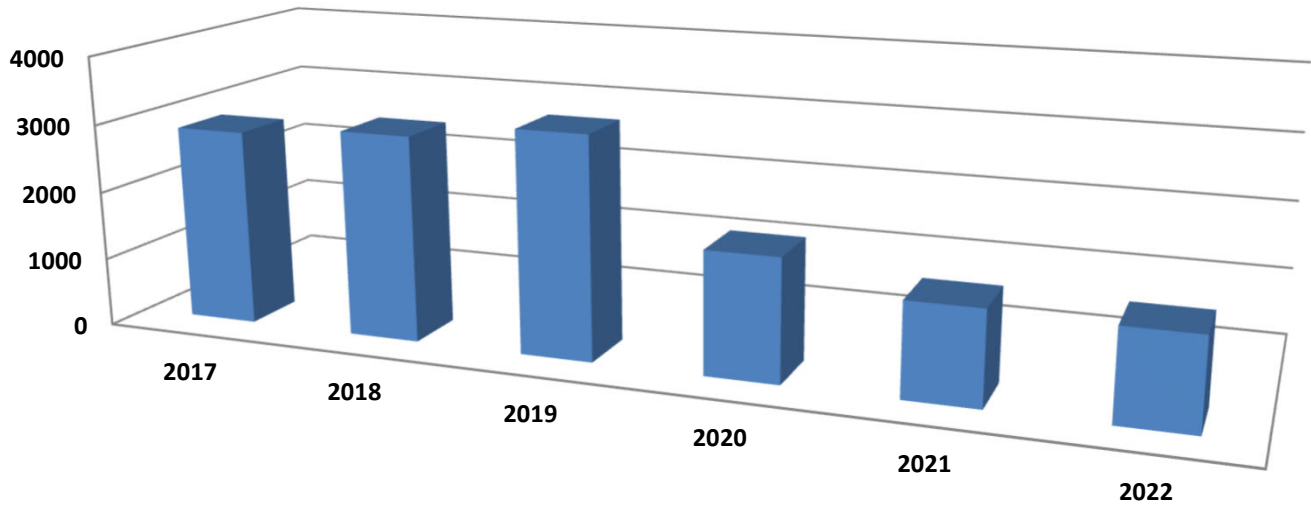
	2018	2019	2020	2021	*2022
Chapter 7	73.2%	73.3%	76.9%	79.7%	72.2%
Chapter 11	1.2%	1.0%	1.3%	0.9%	2.0%
Chapter 12	0.0%	0.0%	0.0%	0.0%	0.1%
Chapter 13	27.9%	25.7%	17.5%	19.3%	25.7%

## Chapter 11 Filings



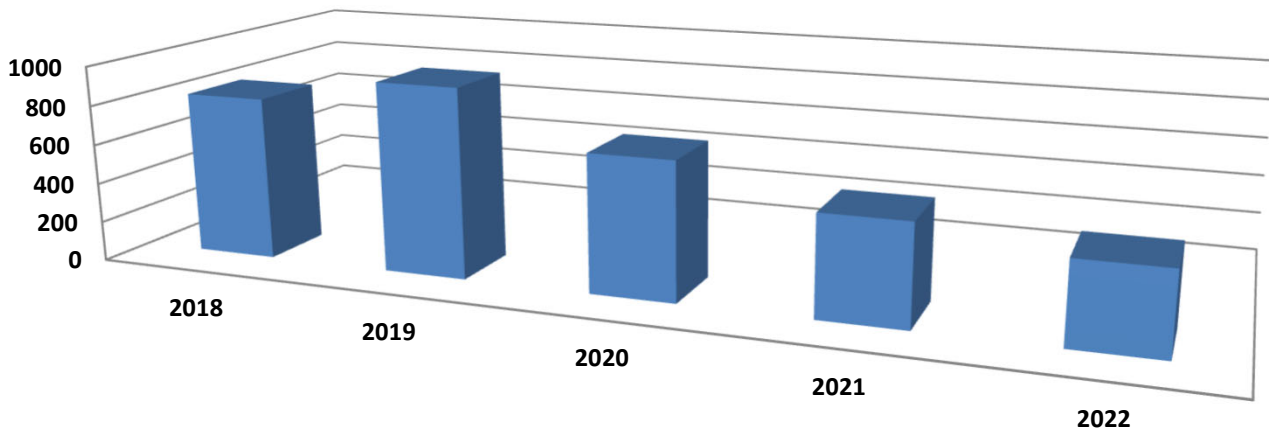
	2018	2019	2020	2021	*2022
Business	205	208	240	185	250
Consumer	68	38	40	31	34

## Pro Se Filings



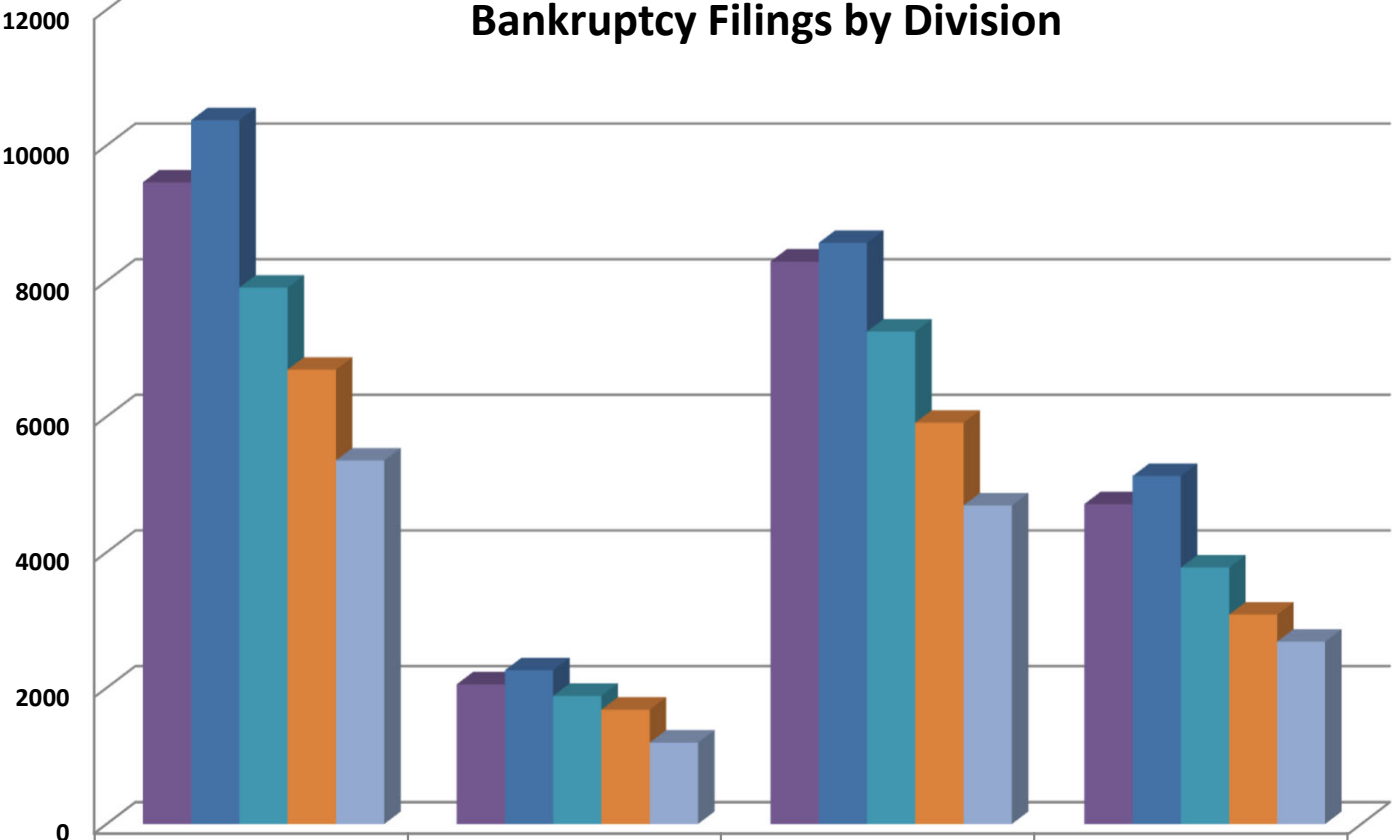
	2017	2018	2019	2020	2021	2022
■ Pro Se	2868	3006	3232	1779	1363	1319
% of All Filings	12%	12%	12%	9%	8%	9%

## In Forma Pauperis Filings



	2018	2019	2020	2021	2022
■ IFP Granted	825	956	691	507	411
% of All Filings	3%	4%	3%	3%	3%

### Bankruptcy Filings by Division



	Tampa	Ft. Myers	Orlando	Jacksonville
2018	9456	2052	8288	4711
2019	10372	2260	8564	5124
2020	7904	1882	7255	3775
2021	6693	1680	5911	3080
2022	5354	1196	4691	2682

Note: Counts include reopen cases  
 Order Granting IFP counts have been corrected to include approving language.