

**THE LONG ROAD TO FLORIDA'S MODERN CONSTITUTION**

*Robert F. Williams**

Making Modern Florida: How the Spirit of Reform Shaped a New State Constitution

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[S]tate legislatures have once again become relatively democratic and representative bodies as a result of the reapportionment revolution begun in 1962 by Baker v. Carr. Not accidentally, that decision spurred a wave of constitutional revision. No fewer than thirteen states revised their basic charters between 1963 and 1976, reviving at least in part, the tradition of activist popular sovereignty.¹

James Henretta

Well into Professor Mary Adkins's deeply researched and welcomed book on the making of Florida's revised 1968 Constitution, she reports the following seemingly innocuous fact: "New legislator Bob Graham, who had been elected to the House in the November 1966 election and attended just one organizing meeting, returned after the March 1967 election and found himself chair of a subcommittee by virtue of being the only remaining Democrat on it."² This seeming fluke turned into

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1. James A. Henretta, *Foreword: Rethinking the State Constitutional Tradition*, 22 RUTGERS L.J. 819, 839 (1991) (footnote omitted); see also TALBOT D'ALEMBERTE, THE FLORIDA STATE CONSTITUTION 15 (2d ed. 2017) ("After *Baker v. Carr*, political power in the Florida legislature shifted from the rural to the urban areas, and a round of constitutional change followed close on the new apportionment. Reapportionment led to a period of intense interest in state constitutional law and major changes in Florida took place with the adoption of the constitution revision of 1968.").

2. MARY E. ADKINS, MAKING MODERN FLORIDA: HOW THE SPIRIT OF REFORM SHAPED A NEW STATE CONSTITUTION 162 (2016); see also *id.* at 115 (indicating Bob Graham was a new Democratic representative in 1966).

one of the most monumental events of my life. Representative Graham hired me to staff his subcommittee (Appropriations, Higher Education Construction) as I was graduating from Florida State with a political science degree.³ The Legislature stayed in session most of the summer, dealing with revisions to the post-Reconstruction 1885 “horse-and-buggy” Florida Constitution.⁴ The voters ratified the final proposed new constitution.⁵ I received a first-hand introduction to state constitutions that summer.

During my ensuing years at the University of Florida College of Law, I published my *Law Review* Note on the property tax provisions of the new constitution.⁶ I represented clients before the relatively unsuccessful 1977 Constitutional Revision Commission,⁷ gave the keynote address to the 1997 Constitutional Revision Commission,⁸ and later reflected on the accomplishments of that 1997 Commission.⁹ When I became a professor at Rutgers Law School, I embarked on a career of teaching, writing, lecturing, and litigating using state constitutions. Based on this involvement with the Florida Constitution (as well as many others) for close to fifty years, it should be apparent why I was so pleased to see Professor Adkins’s new book.¹⁰ Her coverage of the events in Florida illustrates many of the lessons about the politics and challenges surrounding the development and adoption of American

3. Robert F. Williams, *Review Essay: A Generation of Change in Florida State Constitutional Law*, 5 ST. THOMAS L. REV. 133, 136 (1992) (reviewing TALBOT D’ALEMBERTE, *THE FLORIDA STATE CONSTITUTION: A REFERENCE GUIDE* (1991)).

4. ADKINS, *supra* note 2, at 55.

5. *Id.* at 178 (“In the election, 55 percent of voters approved the new constitution. That 55 percent, however, clustered within just sixteen of the sixty-seven counties. The other fifty-one counties voted against the revision.”).

6. Robert F. Williams, Note, *Property Tax Exemptions Under Article VII, Section 3(a) of the Florida Constitution of 1968*, 21 U. FLA. L. REV. 641 (1969). Notably, the Florida Supreme Court cited this Note favorably several times. See *Treasure Coast Marina, LC v. City of Fort Pierce*, 219 So. 3d 793, 796–97 (Fla. 2017); *Fla. Dep’t of Revenue v. City of Gainesville*, 918 So. 2d 250, 264 (Fla. 2005).

7. Robert F. Williams, *The Anatomy of Law Reform: Dissecting a Decade of Change in Florida In Forma Pauperis Law*, 12 STETSON L. REV. 363, 385–86 (1983); Williams, *supra* note 3, at 139. See generally *Symposium on the Proposed Revisions to the Florida Constitution*, 6 FLA. ST. U. L. REV. 565 (1978); Alaine S. Williams, *A Summary and Background Analysis of the Proposed 1978 Constitutional Revisions*, 6 FLA. ST. U. L. REV. 1115 (1978). I say relatively unsuccessful because, in fact, many of the Commission’s “failed” proposals were adopted in later years. D’ALEMBERTE, *supra* note 1, at 19.

8. Robert F. Williams, *The Florida Constitution Revision Commission in Historic and National Context*, 50 FLA. L. REV. 215 (1998).

9. See generally Robert F. Williams, *Foreword: Is Constitutional Revision Success Worth Its Popular Sovereignty Price?*, 52 FLA. L. REV. 249 (2000).

10. Professor Adkins is a Master Legal Skills Professor and Director of Legal Writing and Appellate Advocacy at the University of Florida Levin College of Law.

state constitutions. Further, her detailed analysis of the development of the current constitution may prove useful to lawyers, judges, politicians, the media, and citizens who seek to understand and apply the provisions of the Florida Constitution.

Florida's constitutional history has important pre-statehood origins.¹¹ Its post-statehood constitutional history has been covered by Talbot (Sandy) D'Alemberte¹² and, now, by Professor Adkins.¹³ Professor Adkins demonstrates that Florida's modern constitution was a product of more than a generation of reform efforts by a variety of state leaders, proving the observation by Georgia's former governor that state constitutional revision is not for the "faint of heart."¹⁴

Florida's constitutional reform efforts began well before the United States Supreme Court's one-person-one-vote reapportionment revolution. Professor Adkins notes Florida's very serious malapportionment: "Florida's legislature was badly malapportioned—among the worst in the nation. In 1955, only about one-seventh of its population could elect a majority in each of the Senate and the House."¹⁵ But the "judicial shock" of reapportionment, changing the basis of state legislative representation from places to people, provided the stimulation that is probably responsible for the Florida reform effort

11. See generally M.C. Mirow, *The Constitution of Cádiz in Florida*, 24 FLA. J. INT'L L. 271 (2012); M.C. Mirow, *The Patriot Constitution and International Constitution-Making*, 21 TEX. REV. L. & POL. 477 (2017).

12. D'ALEMBERTE, *supra* note 1, at 3–13.

13. ADKINS, *supra* note 2, at 5–18. For a recent analysis of Florida post-Civil War constitutional development, see generally PAUL E. HERRON, FRAMING THE SOLID SOUTH: THE STATE CONSTITUTIONAL CONVENTIONS OF SUCCESSION, RECONSTRUCTION, AND REDEMPTION, 1860–1902 (2017); ERIC FONER, RECONSTRUCTION: AMERICA'S UNFINISHED REVOLUTION 1863–1877 (1988).

14. Constitutional revision is not for the faint of heart. It is not a Sunday drive in the mountains. It is an incredibly difficult, sometimes tedious, sometimes exhilarating, always challenging undertaking requiring the cooperation of the leadership of all three branches of state government, of counties, municipalities, and local school boards, of the business community and the labor community, of public interest groups and private interest groups, of people inside the government and people outside the government—in short, it requires the cooperation of just about everybody.

George D. Busbee, *An Overview of the New Georgia Constitution*, 35 MERCER L. REV. (SPECIAL CONTRIBUTION) 1, 1–2 (1983). In 1970, Justice E. Harris Drew noted the "long and arduous work of the hundreds of men and women and many sessions of the Legislature in bringing about the Constitution of 1968." *Adams v. Gunter*, 238 So. 2d 824, 832 (Fla. 1970).

15. ADKINS, *supra* note 2, at 33. For more on the Florida Legislature prior to reapportionment, see WILLIAM C. HAVARD & LOREN P. BETH, THE POLITICS OF MIS-REPRESENTATION: RURAL-URBAN CONFLICT IN THE FLORIDA LEGISLATURE 43 (1962).

crossing the finish line.¹⁶ As noted by Dr. James Henretta in the opening quote above, federally-required reapportionment provided the impetus, and the possibility, for state constitutional revision in a number of states.¹⁷ This illustrates another larger lesson in state constitutional law: that developments in *state* constitutional law are sometimes influenced by developments in *federal* constitutional law.¹⁸

The evolution of American state constitutions has been, in part, the product of “waves” of state constitutional adoption and revision.¹⁹ These waves have reflected national or regional political developments, which have consisted of causes and impacts beyond a single state.²⁰ The wave of state constitution-making after *Baker v. Carr* was the last wave we experienced in this country.²¹ As Dr. Alan Tarr pointed out, there has been virtually no significant state constitutional revision or replacement that has taken place in the last several decades.²²

Many of the leaders of Florida politics, other than those whose prerogatives were entrenched in the existing state constitution, had concluded that it was “designed to meet the problems of another era” and was “riddled with piecemeal amendments that have compromised” its coherence as a plan of government.²³ The constitution could not be saved by piecemeal amendment.²⁴ As Dr. Bruce Cain observed:

In theory, constitutional revision should be more comprehensive and qualitatively more significant than a constitutional amendment. But what if revision occurs increasingly through amendment: What is gained and what is lost? The most important advantage should lie in the ability of a Revision

16. See James A. Gardner, *Autonomy and Isomorphism: The Unfulfilled Promise of Structural Autonomy in American State Constitutions*, 60 WAYNE L. REV. 31, 43–46 (2014); ADKINS, *supra* note 2, at 34–35, 53–56.

17. Henretta, *supra* note 1, at 839.

18. G. ALAN TARR, UNDERSTANDING STATE CONSTITUTIONS 45 (1998).

19. See generally ROBERT F. WILLIAMS, THE LAW OF AMERICAN STATE CONSTITUTIONS 85 (2009) [hereinafter WILLIAMS, AMERICAN STATE CONSTITUTIONS].

20. See *id.* at 42–44, 85.

21. Robert F. Williams, *Michigan State Constitutionalism: On the Front of the Last Wave*, 60 WAYNE L. REV. 1, 2 (2014) [hereinafter Williams, *Michigan State Constitutionalism*].

22. See G. Alan Tarr, *Explaining State Constitutional Change*, 60 WAYNE L. REV. 9, 12 (2014).

23. G. Alan Tarr, *Introduction* to 3 STATE CONSTITUTIONS FOR THE TWENTY-FIRST CENTURY: THE AGENDA OF STATE CONSTITUTIONAL REFORM 1, 3 (G. Alan Tarr & Robert F. Williams eds., 2006); ADKINS, *supra* note 2, at 17–30; see also WILLIAMS, *supra* note 19, at 361–63; D’ALEMBERTE, *supra* note 1, at 13 (describing the 1885 Constitution as “a lengthy, confusing, and chaotic document.”).

24. ADKINS, *supra* note 2, at 9–10, 55.

Commission to consider how all the pieces fit together. Where the amendment process is piecemeal and sequential, the revision process affords the opportunity to logically relate proposals to goals, and to make the entire package of proposal[s] coherent.²⁵

It was the common state phenomenon of “constitutional rigidity” that Florida’s reformers confronted over and over, until they finally succeeded with the constitutional revision of 1968.²⁶

Florida constitutional reformers relied on an innovative, two-step process to achieve success in 1968.²⁷ In other words, they utilized a “form of staged constitutional revision, utilizing a vote of the people at two points: first, to approve the amendment modifying the process of revising the constitution . . . and second, at the point of approval or rejection of the revision proposal(s).”²⁸ As D’Alemberte noted, “[i]n 1963, a somewhat reapportioned legislature offered a proposal for the amendment of the Constitution that allowed revision of the Constitution without a constitutional convention, and this was approved by the voters in the 1964 election.”²⁹ This was the first step, amending the 1885 Constitution, thereby enabling the second step that

25. Bruce E. Cain, *Constitutional Revision in California: The Triumph of Amendment Over Revision in 1 STATE CONSTITUTIONS FOR THE TWENTY-FIRST CENTURY: THE POLITICS OF STATE CONSTITUTIONAL REFORM* 59, 64 (G. Alan Tarr & Robert F. Williams eds., 2006) (footnote omitted); see also Bruce E. Cain & Roger G. Noll, *Malleable Constitutions: Reflections on State Constitutional Reform*, 87 TEX. L. REV. 1517 (2009).

26. ADKINS, *supra* note 2, at 2, 4, 9–10, 17–18. See generally Charles V. Laughlin, *A Study in Constitutional Rigidity I*, 10 U. CHI. L. REV. 142 (1943); Kenneth C. Sears & Charles V. Laughlin, *A Study in Constitutional Rigidity II*, 11 U. CHI. L. REV. 374 (1944). A well-known ex-governor observed, based on his experience during this same period of time, “[s]tate constitutions, for so long the drag anchors of state progress, and permanent cloaks for the protection of special interests and points of view, should be revised or rewritten into more concise statements of principle.” TERRY SANFORD, *STORM OVER THE STATES* 189 (1967).

27. See Williams, *Michigan State Constitutions*, *supra* note 21, at 3; WILLIAMS, *AMERICAN STATE CONSTITUTIONS*, *supra* note 19, at 377, 380; Robert F. Williams, *Unsettling the Settled: Challenging the Great and Not-So-Great Compromises in the Constitution*, 91 TEX. L. REV. 1149, 1159–60 (2013).

28. See WILLIAMS, *AMERICAN STATE CONSTITUTIONS*, *supra* note 19, at 380.

29. D’ALEMBERTE, *supra* note 1, at 15. This was an amendment to article XVII, section 4 of the 1885 Constitution. See *Florida Additional Method for Revising State Constitution, Amendment 11 (1964)*, BALLOTPEDIA.COM, [https://ballotpedia.org/Florida_Additional_Method_for_Revising_State_Constitution,_Amendment_11_\(1964\)](https://ballotpedia.org/Florida_Additional_Method_for_Revising_State_Constitution,_Amendment_11_(1964)) (last visited Mar. 15, 2019). The concept is now contained in article XI, section 1 of the 1968 Constitution: “Proposal by legislature.—Amendment of a section or revision of one or more articles, or the whole, of this constitution may be proposed . . .” FLA. CONST. art. XI, § 1 (emphasis added).

Professor Adkins analyzes so well, leading to the voters' approval of the legislatively-proposed, revised 1968 Constitution.³⁰

Actually, there were even earlier steps in Florida's constitutional evolution of the *process*, rather than the *substance*, of state constitutional change.³¹ In 1948, "a baby step in the history of the Florida constitution revision happened: an amendment [to the 1885 Constitution] passed that allowed a complete section of the constitution, not just one subject matter within a single section, to be amended."³² In 1955, Governor LeRoy Collins, a strong proponent of constitutional revision, asked the Legislature to create a constitutional advisory commission. The Legislature complied, the Florida Constitution Advisory Committee made recommendations to the Legislature, and in 1957 it modified the proposals and put the famous "daisy chain" revision on the ballot.³³ This consisted of fourteen separate "amendments" linked together by the requirement that none would take effect unless the voters approved all of them.³⁴ Apparently the "daisy chain" technique was a legislative attempt to control the process of constitutional revision, not a surprising desire, rather than proposing a constitutional convention that it could not control.³⁵

This technique was challenged and the Florida Supreme Court ordered the ballot measures removed before they could be voted upon.³⁶ The court concluded that this was a thinly disguised attempt by the Legislature to *revise* the constitution—a function reserved for a constitutional convention under the constitution at that time.³⁷ The 1964 "first-step" amendment overturned this point of view, paving the way for the 1968 Constitution.³⁸ Here again, we have an illustration of a broader perspective on state constitutions. As Alan Tarr has stated:

30. ADKINS, *supra* note 2, at 53, 102–15.

31. From the first "state" constitutions adopted at the beginning of the Revolution, the processes and procedures of state constitutional change were also able to evolve over time, based on succeeding generations' views about not only the substance of state constitutions, but also about the mechanisms that should be available for their ongoing change.

Robert F. Williams, *Evolving State Constitutional Processes of Adoption, Revision, and Amendment: The Path Ahead*, 69 ARK. L. REV. 553, 555 (2016).

32. ADKINS, *supra* note 2, at 20; FLA. CONST. art. XVII §1 (1885).

33. ADKINS, *supra* note 2, at 21–24.

34. *Id.* at 23.

35. *Id.*

36. ADKINS, *supra* note 2, at 24; *Rivera-Cruz v. Gray*, 104 So. 2d 501, 505 (Fla. 1958).

37. *Rivera-Cruz*, 104 So. 2d at 503–04.

38. *See supra* notes 29–30 and accompanying text.

A final distinctive feature of state constitutional practice regarding constitutional change is the involvement of state courts in overseeing the process of change. The reliance on formal constitutional change in the states has prompted opponents of proposed changes to challenge their legality in the courts. Whereas the United States Supreme Court has dismissed procedural challenges to the federal amendment process as “political questions,” state courts have proved quite willing to address a wide range of issues associated with state constitutional change.³⁹

Throughout Professor Adkins’s treatment of the events leading to the adoption of the 1968 Constitution, she highlights the important role of Chesterfield Smith, the chairman of the Constitution Revision Commission.⁴⁰ Leadership in constitutional conventions and commissions is absolutely crucial to the success of such bodies.⁴¹ Smith, famous in later years as President of the American Bar Association during Watergate, demonstrated exceptional skill in guiding the work of the Commission, the Legislature’s consideration of Commission Proposals, and voter adoption of the revised constitution.⁴²

Another lesson that we have learned is that strong gubernatorial support for constitutional revision is almost always necessary, although never sufficient, for successful revision.⁴³ Governor LeRoy Collins’s active support for reapportionment and constitutional revision proved unsuccessful, at least during his time in office.⁴⁴ On the other hand, when the surprise-Republican Claude Kirk was elected he did not have to worry about reapportionment, but his embrace of constitutional revision was very important in the successful revision efforts.⁴⁵

In 1967 the Florida Legislature placed its revised constitution on the ballot in three separate proposals: one that was relatively

39. TARR, *supra* note 18, at 26.

40. ADKINS, *supra* note 2, at 62–65.

41. See ELMER E. CORNWELL, JR. ET AL., STATE CONSTITUTIONAL CONVENTIONS: THE POLITICS OF THE REVISION PROCESS IN SEVEN STATES 199 (1975) (“The key roles played by the presidents of the various conventions emerged unmistakably. All that we know descriptively about convention behavior underscores the vital importance of the role of the presiding officer.”).

42. ADKINS, *supra* note 2, at 62–63, 66–67.

43. WILLIAMS, AMERICAN STATE CONSTITUTIONS, *supra* note 19, at 377.

44. ADKINS, *supra* note 2, at 14, 20–30; see also Talbot “Sandy” D’Alemberte & Frank Sanchez, *A Tribute to a Great Man: LeRoy Collins*, 19 FLA. ST. U. L. REV. 255, 262 (1991) (describing how Justice Hugo Black told Collins that this “failure” had contributed to the Court’s willingness to take up the reapportionment issue).

45. See ADKINS, *supra* note 2, at 115–18.

noncontroversial and two that had the potential to draw some opposition.⁴⁶ They were not “daisy chained.” Based on what I learned in Florida, many years later I wrote:

The convention or commission should give serious consideration to separating controversial proposals for their individual presentation to the voters rather than a single “take-it-or-leave-it” package. On the other hand, if proposals are interdependent as part of a coherent revision, they should be identified as such to the voters and presented together, if possible, under the state’s established processes; or if required to be presented separately, they should be interlocked so that the adoption of each is dependent on the adoption of the other(s).⁴⁷

Professor Adkins reports that many of the participants in the processes leading to the 1968 Constitution viewed its expanded provisions for amendment and revisions to be the “most important” of the proposals.⁴⁸ She states: “The core purpose of the additions to this article was to take sole control away from the legislature and place the power to amend the constitution in the hands of the Florida voters.”⁴⁹ This has led Sandy D’Alemberte to conclude that the Florida Constitution now “provides more methods for amending the Constitution than any other state.”⁵⁰ One only needs to read article X, section 21 of the constitution, outlawing “gestation crates” for pregnant pigs, to see the result of an easy-to-amend state constitution.⁵¹ In approving this and other proposed amendments for the ballot, the Florida Supreme Court has been very critical of this use of the state constitution for what I have called “instruments of lawmaking.”⁵²

46. ADKINS, *supra* note 2, at 175. See generally WILLIAMS, AMERICAN STATE CONSTITUTIONS, *supra* note 19, at 369–70.

47. WILLIAMS, AMERICAN STATE CONSTITUTIONS, *supra* note 19, at 378–79

48. ADKINS, *supra* note 2, at 149.

49. *Id.*

50. D’ALEMBERTE, *supra* note 1, at 315; see also *id.* at 22 (“Given the willingness of the legislature to propose amendments, the availability of the initiative process to the citizenry, and the frequent review by two appointed commissions, one meeting each decade, it is clear that this history of the Florida Constitution will continue to be written in virtually every election.”).

51. FLA. CONST. art. X, § 21. This provision was added through an initiative adopted in 2002. Notably, the Florida Constitution only permits the initiative to be used to propose amendments or revisions to the *constitution*, and not to propose *statutes*. D’ALEMBERTE, *supra* note 1, at 159–60; see also FLA. CONST. art. X, § 19 (repealed 2005) (high-speed railroad); *id.* art. X, § 20 (workplace smoking).

52. Advisory Opinion to the Attorney General Re Limiting Cruel and Inhumane Confinement of Pigs During Pregnancy, 815 So. 2d 597, 600 (Fla. 2002) (Pariente, J.,

Based on this “activist popular sovereignty” element,⁵³ “state constitutions are more democratic than the Federal Constitution in that they involve the citizenry in approving their amendment and revision, voting to approve borrowing, and in some states, approving new forms of gambling.”⁵⁴ Because of the “many waves of revision” over the years, they reflect “the alternative voices of African Americans, Hispanics, Native Americans and women—voices that had little impact on the Federal Constitution.”⁵⁵ These waves have reflected a continuing dialogue about fundamental matters of governmental structure and function that cannot take place under the difficult-to-amend Federal Constitution.⁵⁶ However, I have observed:

If state constitutional revision is too difficult, constitutionalism overwhelms democracy; if it is too easy, democracy overwhelms constitutionalism. It is difficult to achieve exactly the right balance, and this point might change over time. Any assessment of a state constitution’s obsolescence must also take account of, and consider adjustments in, the processes of changing or revising the constitution.⁵⁷

So, the state constitutional pendulum in Florida has swung from entrenched rigidity to relative ease of both amendment and revision. The question whether Florida’s constitution is too easy to amend is worth consideration going forward. Those who point to the pregnant pigs clause will no doubt suggest it is too easy.⁵⁸ Others, by contrast, will point to the adoption of the 1968 Constitution itself, and the moderate changes that have been accomplished through various mechanisms since then as the positive result of “activist popular sovereignty.” In any event, there will be plenty of activity for Professor

concurring) (per curiam); WILLIAMS, AMERICAN STATE CONSTITUTIONS, *supra* note 19, at 23, 390 (quoting Robert F. Williams, *State Constitutional Law Processes*, 24 WM. & MARY L. REV. 169, 175 (1983)).

53. Henretta, *supra* note 1, at 826, 839.

54. Robert F. Williams, Response, *Why State Constitutions Matter*, 45 NEW ENG. L. REV. 901, 905 (2011).

55. *Id.* The Constitution Revision Commission, whose work led to the 1968 Constitution, was diverse in geography and in other ways but not on the basis of race or gender. There were no African-Americans and only one white woman. ADKINS, *supra* note 2, at 65–72.

56. *See also* JOHN DINAN, STATE CONSTITUTIONAL POLITICS: GOVERNING BY AMENDMENT IN THE AMERICAN STATES 1, 3 (2018). *See generally* JOHN J. DINAN, THE AMERICAN STATE CONSTITUTIONAL TRADITION 1, 3, 5 (2006) (addressing the importance of constitutional debates at the state level).

57. WILLIAMS, AMERICAN STATE CONSTITUTIONS, *supra* note 19, at 363.

58. *See supra* note 51 and accompanying text.

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Adkins and others interested in Florida constitutional law to participate in, observe, and analyze.⁵⁹ *Making Modern Florida* is a great start.

59. Professor Adkins has also summarized her findings and analyzed proposals, especially by the unique Constitution Revision Commission, for further changes since 1968. See Mary E. Adkins, *The Same River Twice: A Brief History of How the 1968 Constitution Came to Be and What It Has Become*, 18 FLA. COASTAL L. REV. 5, 5–6, 32 (2016); see also Rebecca Mae Salokar, *Constitutional Revision in Florida: Planning, Politics, Policy, and Publicity*, in 1 STATE CONSTITUTIONS FOR THE TWENTY-FIRST CENTURY: THE POLITICS OF STATE CONSTITUTIONAL REFORM, *supra* note 25, at 19 (analyzing the 1977–1978 and 1997–1998 Constitution Revision Commissions).