

IN THE SUPREME COURT OF FLORIDA

THE FLORIDA BAR,

Supreme Court Case
No. SC16-1016

Complainant,

The Florida Bar File
No. 2016-70,411(11K-OSC)

v.

ANETT LOPEZ,

Respondent.

VERIFIED RESPONSE TO ORDER TO SHOW CAUSE

The Respondent, ANETT LOPEZ, by and through her undersigned attorney, files this Response to this Court's June 8, 2016 Order to Show Cause, and states:

1. Anett Lopez is the Respondent in two distinct pending Florida Bar Grievances that are currently under investigation by Grievance Committee 11K. A second lawyer, who she associates with in representing clients, Donald Kerner, also has two pending grievances that are interrelated to hers.

2. During the course of said investigation Lopez and Kerner have been requested to produce a variety of documents and records either through written request from Bar counsel or via a subpoena duces tecum for the production of records. Collectively, Lopez and Kerner have expended \$27,500.00 in accounting fees and another \$20,000.00 in securing copies of bank records. They believe that they have tried in good faith to secure and produce that which the Bar has

requested. Admittedly, they have not been as prompt in the production as the Bar expected because they have needed to purchase records from the bank and for their accountant to properly prepare the records for audit.

3. At the outset of the production process, Lopez did deliver hard copies of checks, deposit slips, bank statements, etc., that were responsive to the Bar's requests, but as her accounting practices were inadequate, she was asked by the Bar to produce better ledgers and journals and to put same into a computer accounting program such as QuickBooks. She has endeavored to do so, but due to the volume and complexities of her trust account, this process has taken significant time. This process was further complicated by a computer virus that not only affected her QuickBooks program but also fatally damaged her server.

4. On Wednesday, June 22, 2016, Lopez hand delivered electronic copies of the following documents to The Florida Bar:

a. Anett Lopez Law Group – all bank deposits, checks and statements from 1/2014 – 6/2015;

b. Lopez Flagler Law Group – all bank deposits, checks and statements from 1/2014 – 6/2015;

c. Lopez PIP Law Group – all bank deposits and statements from 1/2014- 6/2015;

d. Lopez Legal Group Wellsfargo – all bank deposits, checks and statements till 6/2015; and

e. Lopez Legal Group Regions – all bank statements from 1/2014 -- 6/2015.

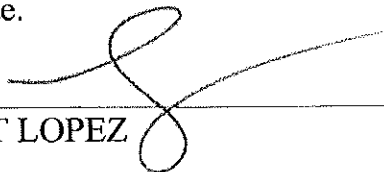
5. Lopez believes that the foregoing production has brought her into substantial compliance with the subpoena at issue in this matter.

6. Lopez would respectfully request that she not be held in willful contempt of this Court or of the Grievance Committee and that should the Court be concerned about the adequacy of her records production that a Referee be appointed to consider same and to make recommendations to the Court as to said production and if a disciplinary sanction should attach regarding said production.

WHEREFORE, the Respondent, ANETT LOPEZ, respectfully requests that she not be held in contempt; that a Referee be appointed to discern her efforts at compliance and to make any necessary recommendations as to sanction regarding her compliance; and for such other relief as the Court finds reasonable and just.

Verification

The undersigned, under penalty of perjury, verifies that the above referenced information is true, correct and complete.


ANETT LOPEZ



CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that a true copy of the foregoing has been furnished by electronic mail only to: Patrick Russell, Esquire, Bar Counsel, at (prussell@flabar.org; gmulligan@flabar.org) The Florida Bar, 444 Brickell Avenue, Suite M100, Miami, Florida 33131-2408, and to Adria E. Quintela, Staff Counsel, The Florida Bar, 1300 Concord Terrace, Suite 130, Sunrise, FL 33323 (aquentel@flabar.org) on this 23 day of June 2016.

Respectfully submitted,

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By:

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