SUPREME COURT OF FLORIDA CASE NO. SC20-1118 The Florida Bar File No. 2018-70,052(11J)

THE FLORIDA BAR, Complainant,

versus

MICHAEL C. GRIECO, Respondent.

SECOND AMENDED ANSWER¹

Respondent Michael C. Grieco submits his Answer to The Florida Bar's Complaint pursuant to Rule 3-7.6(h)(2) of the Rules Regulating The Florida Bar and states the following:

- 1. Admit.
- 2. Admit.
- 3. Without personal knowledge; therefore, denied in full.
- 4. Denied as to "actively campaigning for reelection to that position, until such time as he decided to enter the race for Mayor of Miami Beach."
 - 5. Denied.
- 6. Admit as to Citizens' Bill of Rights and Miami-Dade Commission on Ethics and Public Trust but denied as to underlying facts.

¹ This Second Amended Answer corrects the Answer to Paragraphs 20-23 of the Complaint to comport with § 943.0585(6)(b), Florida Statutes (2019).

- 7. Without personal knowledge as to conduct and statements of others; therefore, denied in full.
- 8. Without personal knowledge as to conduct and statements of others; therefore, denied in full.
- 9. Without personal knowledge as to conduct and statements of others; therefore, denied in full.
- 10. Without personal knowledge as to conduct and statements of others; therefore, denied in full.
- 11. Without personal knowledge as to conduct and statements of others; therefore, denied in full.
- 12. Without personal knowledge as to conduct and statements of others; therefore, denied in full.
- 13. Without personal knowledge as to conduct and statements of others; therefore, denied in full.
- 14. Without personal knowledge as to conduct and statements of others; therefore, denied in full.
- 15. Without personal knowledge as to conduct and statements of others; therefore, denied in full.
- 16. Without personal knowledge as to conduct and statements of others; therefore, denied in full.

- 17. Without personal knowledge as to conduct and statements of others; therefore, denied in full.
- 18. Without personal knowledge as to conduct and statements of others; therefore, denied in full.
- 19. Admit and denied in part as to the completeness of Respondent's statements, as his statements to the investigating member of The Florida Bar speaks for itself.
 - 20. Denied in accordance with § 943.0585(6)(b), Florida Statutes (2019).
- 21. Without personal knowledge as to the conduct and statements of others; denied in accordance with § 943.0585(6)(b), Florida Statutes (2019).
 - 22. Denied in accordance with § 943.0585(6)(b), Florida Statutes (2019).
 - 23. Denied in accordance with § 943.0585(6)(b), Florida Statutes (2019).
 - 24. Denied.
- 25. As defenses, Respondent asserts that his conduct and statements were truthful, did not violate the cited Rules Regulating The Florida Bar, and did not involve conduct or statements involving the practice of law or implicating his status as a lawyer involved in the practice of law.

Respectfully submitted,

KUEHNE DAVIS LAW, P.A. Miami Tower, Suite 3105 100 S.E. 2 St. Miami, FL 33131-2154

Tel: 305.789.5989 Fax: 305.789.5987

ben.kuehne@kuehnelaw.com mdavis@kuehnelaw.com efiling@kuehnelaw.com

By: S/ Benedict P. Kuehne

BENEDICT P. KUEHNE Florida Bar No. 233293 MICHAEL T. DAVIS Florida Bar No. 63374

CERTIFICATE OF SERVICE

I certify this document was efiled on August 29, 2020, to:

JENNIFER R. FALCONE

Florida Bar No. 624284 Bar Counsel The Florida Bar – Miami Branch Office 444 Brickell Avenue, Suite M-100 Miami, FL 33131-2404 Tel: 305.377.4445 jfalcone@floridabar.org

PATRICIA ANN TORO SAVITZ

Florida Bar No. 559547 Bar Counsel The Florida Bar 651 E. Jefferson Street Tallahassee, FL 32399-2300 Tel: 850.561.5839 psavitz@floridabar.org

HON. MARLENE FERNANDEZ-KARAVETSOS. Referee

Attention: Mercedes Feliciano, Judicial Assistant Richard E. Gerstein Justice Bldg.217 1351 N.W. 12th Street Miami, FL 33125 Tel: (305) 548-5618 F002@jud11.flcourts.org

S/Benedict P. Kuehne BENEDICT P. KUEHNE