

IN THE SUPREME COURT OF FLORIDA
(Before a Referee)

THE FLORIDA BAR,

Complainant,

v.

GREGORY SALDAMANDO,

Respondent.

Supreme Court Case
No. SC20-844

The Florida Bar File
No. 2019-70,685(11C)

RESPONDENT'S ANSWER TO COMPLAINT

The Respondent, Gregory Saldamando, hereby files his Answer to The Florida Bar's Complaint and states the following:

1. Paragraph 1 of the Complaint is admitted.
2. Paragraph 2 is denied, as Mr. Saldamando is no longer employed by the Strem Law Firm, P.A. ("SLF") as of July 13, 2020.
3. Paragraph 3 is admitted.
4. Mr. Saldamando is without knowledge.
5. Paragraph 5 is denied.
6. Paragraph 6 is denied.

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7. Mr. Alvarez's characterization of Mr. Saldamando in paragraph 7 is denied.

8. Paragraph 8 is denied.

9. Paragraph 9 is admitted as to only the last sentence. Mr. Saldamando does not adopt the language of the July 1, 2019 letter.

10. Mr. Saldamando is without knowledge, paragraph 10 is denied.

11. Paragraph 11 is admitted.

12. Paragraph 12 is admitted. Mr. Saldamando played no role in preparing or approving the retainer agreement in this case. The quoted language is not the entirety of the relevant language in the retainer agreement.

13. Paragraph 13 is admitted.

14. Paragraph 14 is denied as to the first sentence. The second sentence is admitted in this case.

15. Paragraph 15 is denied.

16. Paragraph 16 is admitted.

17. Paragraph 17 is admitted.

18. Paragraph 18 is denied.
19. Paragraph 19 is admitted, a proposal for settlement was communicated via letter.
20. Paragraph 20 is admitted.
21. Paragraph 21 is denied.
22. Paragraph 22 is admitted.
23. Paragraph 23 is admitted.
24. Paragraph 24 is admitted. Mr. Saldamando acted on the authority he was given previously to settle the matter.
25. Paragraph 25 is admitted.
26. Mr. Saldamando is without knowledge, paragraph 26 is denied.
27. Paragraph 27 is admitted.
28. Mr. Saldamando is without knowledge, paragraph 28 is denied.
29. Paragraph 29 is admitted.
30. Paragraph 30 is admitted.

31. Paragraph 31 is admitted, in part. Mr. Saldamando is without knowledge about the first sentence.

32. Paragraph 32 is denied. Mr. Saldamando informed the clients that they would receive the settlement amount as previously authorized, and that he would provide settlement documentation when completed.

33. Paragraph 33 is denied, though as to the second sentence Mr. Saldamando acknowledges the listed information was not provided to Mr. Alvarez on that date.

34. Mr. Saldamando admits to sending the email in paragraph 34.

35. Paragraph 35 is denied.

36. Paragraph 36 is denied.

37. Paragraph 37 is admitted as to introductory sentences and subparagraph c. Subparagraphs b. and c. are denied.

38. Paragraph 38 is admitted.

39. Paragraph 39 is admitted, although settlement documents had not been completed as of that date.

40. Paragraph 40 is admitted.

41. Paragraph 41 is admitted.

42. Paragraph 42 is admitted.

43. Paragraph 43 is admitted.

44. Paragraph 44 is admitted.

45. Paragraph 45 is admitted.

46. Paragraph 46 is admitted.

47. Paragraph 47 is denied. Mr. Saldamando does not adopt the language of the July 1, 2019 letter.

48. Paragraph 48 is admitted, in part. The case was settled on a global basis. Mr. Saldamando does not adopt the language of the July 1, 2019 letter.

49. Paragraph 49 is admitted.

50. Paragraph 50 is admitted.

51. Paragraph 51 is denied. Mr. Saldamando does not adopt the language of the July 1, 2019 letter.

52. Paragraph 52 is denied.

53. Paragraph 53 is denied.

54. Paragraph 54 is denied.

55. Paragraph 55 is denied. Mr. Saldamando does not adopt the language of the July 1, 2019 letter.

56. Paragraph 56 is denied. Mr. Saldamando does not adopt the language of the July 1, 2019 letter.

57. Paragraph 57 is denied.

58. Paragraph 58 is denied.

DATED at Jacksonville, Florida this 18th day of August, 2020.

BEDELL, DITTMAR, DeVAULT, PILLANS & COXE
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CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of August, 2020, a true and correct copy of the foregoing has been electronically filed with the Clerk of the Court by utilizing the Florida Courts E-Filing Portal, which will send a notice of electronic filing to:

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