

IN THE SUPREME COURT OF FLORIDA

THE FLORIDA BAR,
Complainant,

v.

R. Christopher A. Lim,
Respondent.

Supreme Court Case No.:SC21-1666
The Florida Bar File Nos.:
2020-30,317(5B), 2021-30,262(5B)

ANSWER

Respondent, R. Christopher A. Lim, files this answer and states:

1. Admit.
2. Admit and additionally practiced in Lake County.
3. Admit.

COUNT I – The Florida Bar File No. 2020-20,317 (5B)

4. Without knowledge, therefore denied.
5. Without knowledge, therefore denied.
6. Without knowledge, therefore denied.
7. Without knowledge of affiliation of Andrea Maria Roebuck, herein also referred to as “ROEBUCK” & Titans Reserve Group, herein also referred to as “TITANS” besides TITANS did administrative tasks for ROEBUCK.
8. Admit that ROEBUCK provided legal services to that TITANS introduced to ROEBUCK.
9. Admit that TITANS collected monies for lawfirm of ROEBUCK.
10. Admit.
11. Admit.
12. Admit.
13. Admit.
14. Admit.
15. Admit.
16. Denied in that Resilient Group, herein “RESILIENT”, focused on financing experts to determine fraudulent mortgage notes.
17. Denied in that RESILIENT engaged experts to determine whether notes were original or re-created.
18. Denied.
19. Admit in working with Allan Campbell’s law firm, herein also referred to as CAMPBELL LLC
20. Admit in that CAMPBELL LLC provided legal services that Resilient Group introduced.
21. Admit.
22. Admit.
23. Without complete knowledge, in that CAMPBELL LLC had funding deriving from other legal services.
24. Admit.
25. Without complete knowledge. Boling and Howell were associated with Resilient Group.

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26. Without complete knowledge, Campbell did show interest in foreclosure defense and bankruptcy cases.
27. Admit in that Respondent worked on foreclosure defense cases.
28. Admit.
29. Admit.
30. Admit.
31. Admit.
32. Admit.
33. Admit.
34. Denied in characterizing scientific process as unproven, the scientific process to be used seemed to be self evident.
35. Admit.
36. Admit.
37. Denied in part in that Members may have had different agreements.
38. Without knowledge, therefore denied.
39. Denied in that clients had choice to terminate law services and seek representation elsewhere.
40. Admit.
41. Admit.
42. Without complete knowledge, passwords were available to Campbell's chosen staff.
43. Admit.
44. Admit.
45. Admit.
46. Admit.
47. Admit.
48. Admit that Campbell may make those allegations, Denied in that Campbell knew foreclosure filings were under his firm.
49. Denied.
50. Without knowledge.
51. Without knowledge.
52. Without knowledge.
53. Without knowledge.
54. Admit that RESILIENT was financing legal services for Joseph & Jodell Altier.
55. Admit.
56. Admit.
57. Admit.
58. Admit.
59. Admit.
60. Admit.
61. Admit.
62. Admit.
63. Admit.
64. Admit.
65. Denied.
66. Admit that Campbell may have testified as indicated, but denied as to Campbell understanding why meeting occurred.
67. Without knowledge.
68. Without knowledge, Altier was represented by Kelley Bosecker.

69. Without knowledge.
70. Without knowledge.
71. Without knowledge of details of agreement and signatories.
72. Admit.
73. Admit.
74. Denied.
75. Admit.
76. Denied in that Altier had Respondent's cell.
77. Without knowledge.
78. Denied in that responsible attorney would have made an appearance on a case.
79. Admit.
80. Admit.
81. Without sufficient knowledge as to reasoning, Admit that Roebuck formed a new entity.
82. Without sufficient knowledge.
83. Admit.
84. Admit.
85. Denied in part in that Respondent believed that Roebuck & Campbell seemed to have agreed.
86. Admit that Substitutions of Counsel were not filed. Denied in that clients had communication with attorneys and case filings signed by respondent or Roebuck
87. Admit.
88. Denied in that clients were to be communicated that Respondent or Roebuck would continue representation if they desired.
89. Admit.
90. Admit.
91. Admit.
92. Admit.
93. Admit.
94. Admit.
95. Denied in part in that initial routine filings were under supervision.
96. Admit.
97. Denied in the allegations of professional misconduct.
98. Denied in part in that Bosecker would conference in a client to introduce client to respondent.
99. Denied in that Bosecker was to give any opinion. Bosecker made introductions.
100. Admit.
101. Admit.
102. Denied.

COUNT II – The Florida Bar File No. 2021-30,262 (5B)

103. Admit.
104. Admit.
105. Admit.
106. Admit.
107. Admit.
108. Admit.
109. Admit.
110. Admit.

111. Admit.
112. Admit.
113. Admit.
114. Denied in part, in at the time of prosecuting appeal, Respondent had believed (though later found that that preserving appealable error was necessary) the appeal to NOT be frivolous.

CERTIFICATE OF SERVICE

The undersigned certifies copy of the foregoing has been furnished to: Complainant Attorneys Patricia Ann Toro Savitz at psavitz@floridabar.org, mmara@floridabar.org, swalker@floridabar.org & Laura N Gryb at lgryb@floridabar.org, orlandooffice@floridabar.org, dsullivan@floridabar.org via Florida Courts E-Filing Portal this day of e-filing.

/s/J. Andrew Braithwaite

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