

IN THE SUPREME COURT OF FLORIDA

THE FLORIDA BAR,

Petitioner,

v.

MARY MICHELE HUDSON,

Respondent.

Supreme Court Case
No. SC-

The Florida Bar File
No. 2022-50,329(171)OSC

_____ /

PETITION FOR CONTEMPT AND ORDER TO SHOW CAUSE

The Florida Bar, petitioner, pursuant to Rule 3-7.11(f), Rules Regulating The Florida Bar, files this Petition for Contempt and Order to Show Cause, and states:

1. A copy of the Grievance Committee Finding of Non-Compliance and Failure to Respond to Official Bar Inquiry and Contempt is attached to this Petition as "**Exhibit 1**".

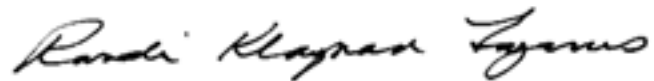
2. As of the date of the service of this Petition, respondent has failed to respond to an official Bar inquiry.

3. The other members of The Florida Bar should not have to pay for respondent's failure to respond to an official bar inquiry and the initiation of the instant proceeding. Therefore, the Bar is requesting administrative costs of \$1,250.00 against respondent.

RECEIVED, 12/21/2021 09:56:21 AM, Clerk, Supreme Court

WHEREFORE, The Florida Bar requests that this Court suspend respondent pursuant to Rule 3-7.11(f), until such time as respondent fully responds in writing to the official Bar inquiry contained in “**Exhibit 1**” and until further order of this Court.

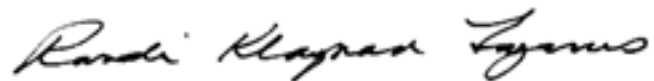
Respectfully submitted,



Randi Klayman Lazarus
Bar Counsel
The Florida Bar
Fort Lauderdale Branch Office
Lake Shore Plaza II
1300 Concord Terrace, Suite 130
Sunrise, Florida 33323
(954) 835-0233
Florida Bar No. 360929
rlazarus@floridabar.org
smiles@floridabar.org

CERTIFICATE OF SERVICE

I certify that this document has been E-Filed with The Honorable John A. Tomasino, Clerk of the Supreme Court of Florida, using the E-Filing Portal and that a copy has been furnished by regular United States Mail United States Mail via certified mail No. 7017 0530 0000 0474 9214, return receipt requested to Mary Michele Hudson, Maverick Law, LLC, 4440 PGA Blvd Ste 600, Palm Beach Gardens, FL 3341-06542, and via email to mavericklawllc@aol.com; with a copy to Staff Counsel, Patricia Ann Toro Savitz, The Florida Bar, via email to psavitz@floridabar.org, on this 21st day of December 2021.



Randi Klayman Lazarus, Bar Counsel

The Florida Bar
Fort Lauderdale Branch Office
Lake Shore Plaza II
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(954) 835-0233
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rlazarus@floridabar.org
smiles@floridabar.org

**NOTICE OF TRIAL COUNSEL AND DESIGNATION OF PRIMARY
EMAIL ADDRESS**

PLEASE TAKE NOTICE that the trial counsel in this matter is Randi Klayman Lazarus, Bar Counsel, whose address, telephone number and primary email address are The Florida Bar, Fort Lauderdale Branch Office, Lake Shore Plaza II, 1300 Concord Terrace, Ste. 130, Sunrise, FL 33323, (954) 835-0233 and rlazarus@floridabar.org and smiles@floridabar.org. Respondent need not address pleadings, correspondence, etc. in this matter to anyone other than trial counsel and to Staff Counsel, The Florida Bar, 651 E. Jefferson Street, Tallahassee, FL 32399-2300, via email to psavitz@floridabar.org,

IN THE SUPREME COURT OF FLORIDA
(Before a Grievance Committee)

THE FLORIDA BAR,
Complainant,

The Florida Bar File
No. 2019-50,659(17I)

v.

MARY MICHELE HUDSON,
Respondent.

**GRIEVANCE COMMITTEE FINDING OF NON-COMPLIANCE AND
FAILURE TO RESPOND TO OFFICIAL BAR INQUIRY AND CONTEMPT**

On November 19, 2021, pursuant to Rule 3-7.11(f), Rules Regulating The Florida Bar, the Seventeenth Judicial Circuit Grievance Committee "I" considered whether to issue a Finding of Non-Compliance and Failure to Respond to Official Bar Inquiry and Finding of Contempt and made the following findings:

1. On April 1, 2019, respondent was sent a letter by regular U.S. Mail to respondent's record Bar address advising of a complaint in this case and was requested to respond by April 15, 2019. A copy of the letter is attached hereto as a part of "Composite Exhibit A".
2. The letter was returned to The Florida Bar.
3. Respondent failed to respond to The Florida Bar as requested in the letter of April 1, 2019.

4. On May 3, 2019, respondent was sent another letter, by email to her record bar email address of mavericklawllc@aol.com and regular U.S. Mail to respondent's record Bar address, advising of a complaint in this case and was requested to respond in ten days to the letter. A copy of the letter is attached hereto as a part of "Composite Exhibit A".

5. The letter sent regular U.S. Mail was returned to The Florida Bar.

6. Respondent failed to respond to The Florida Bar as requested in the letter of May 3, 2019.

7. On June 5, 2019 a third letter was sent to respondent at two separate email addresses, mavericklawllc@aol.com and marymicheleHUDSON@aol.com and by regular U.S. Mail to her record bar address. Such letter requested a response to the complaint in this matter by June 17, 2019. A copy of this letter is attached hereto as a part of "Composite Exhibit A".

8. Respondent failed to respond.

9. On June 7, 2019, Staff Investigator, John Berrena, attempted to contact respondent at numerous telephone numbers identified in a background search of respondent. The phone numbers identified were either disconnected, now belonged to others, or Berrena was unable to

leave a message. Berrena also sent an email to respondent at another possible email address, mirahsttheory@gmail.com, but received no response.

10. On October 19, 2021, Berrena sent an email to marymicheleHUDSON@aol.com but received no response.

11. On October 27, 2021, Berrena left a message for respondent at the telephone number (281) 719-8301 and sent an email to another possible email address, awintertheory@gmail.com. No response was received.

12. Berrena left a second voicemail for respondent at the telephone number (281) 719-8301 on November 1, 2021. No response was received.

13. On November 3, 2021, Berrena went to respondent's records bar address.

14. Neither respondent's name nor the name of the law firm (Maverick Law) appeared on the building directory.

15. Berrena went to the suite number indicated in respondent's record bar address.

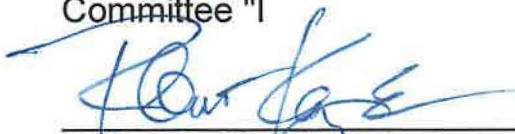
16. Berrena was informed that respondent had not been at that address for approximately 4 years and had not left any forwarding information.

17. The Grievance Committee found that Respondent failed to show good cause for failing to respond to the official Bar inquiries. Additionally, the non-compliance was willful after the respondent failed to provide any response to the notice of hearing on non-compliance which was sent to the respondent's record bar email. That email returned the notice as undeliverable. The respondent has failed to update this information with The Florida Bar.

18. The Grievance Committee found Respondent to be in contempt and requested The Florida Bar to file a Petition for Contempt and Order to Show Cause with the Supreme Court.

Dated this 29th day of November, 2021.

Seventeenth Judicial Circuit Grievance
Committee "I




Robert L. Kaye, Chair

CERTIFICATE OF SERVICE

I certify this document has been furnished by regular U.S. Mail and email to respondent, Mary Michele Hudson, Maverick Law, LLC, 4440 PGA Blvd., Ste. 600, Palm Beach Gardens, FL 33410-6542; and via email to mavericklawllc@aol.com; and via email to Robert L. Kaye, Chair, at rkaye@kbrlegal.com; Jay Kim, Designated Reviewer, at jkim@kvllaw.com

and to Staff Counsel, The Florida Bar, via email at psavitz@floridabar.org, dated this 2nd day of December 2021.

A handwritten signature in black ink, reading "Randi Klayman Lazarus". The signature is written in a cursive, flowing style.

Randi Klayman Lazarus, Bar Counsel

IN THE SUPREME COURT OF FLORIDA
(Before a Grievance Committee)

THE FLORIDA BAR,
Complainant,

The Florida Bar File
No. 2019-50,659(171)

v.

MARY MICHELE HUDSON,
Respondent.

**REQUEST FOR ISSUANCE OF NOTICE OF NON-COMPLIANCE
AND FINDING OF CONTEMPT**

Pursuant to Rule 3-7.11(f)(2), Rules Regulating The Florida Bar, the undersigned Bar Counsel requests that on November 19, 2021, the Seventeenth Judicial Circuit Grievance Committee "I", hear the issue of whether respondent shall be found in contempt for failure to respond to an official Bar inquiry without good cause shown and states the following:

1. On April 1, 2019, respondent was sent a letter by regular U.S. Mail to respondent's record Bar address advising of a complaint in this case and was requested to respond by April 15, 2019. A copy of the letter is attached hereto as "Exhibit A".
2. The letter was returned to The Florida Bar.
3. Respondent failed to respond to The Florida Bar as requested

in the letter of April 1, 2019.

4. On May 3, 2019, respondent was sent another letter, by email to her record bar email address of mavericklawllc@aol.com and regular U.S. Mail to respondent's record Bar address, advising of a complaint in this case and was requested to respond in ten days to the letter. A copy of the letter is attached hereto as "Exhibit B".

5. The letter sent regular U.S. Mail was returned to The Florida Bar.

6. Respondent failed to respond to The Florida Bar as requested in the letter of May 3, 2019.

7. On June 5, 2019 a third letter was sent to respondent at two separate email addresses, mavericklawllc@aol.com and marymicheleHUDSON@aol.com and by regular U.S. Mail to her record bar address. Such letter requested a response to the complaint in this matter by June 17, 2019. A copy of this letter is attached hereto as "Exhibit C".

8. Respondent failed to respond.

9. On June 7, 2019, Staff Investigator, John Berrena, attempted to contact respondent at numerous telephone numbers identified in a background search of respondent. The phone numbers identified were either disconnected, now belonged to others, or Berrena was unable to leave a message. Berrena also sent an email to respondent at another

possible email address, mirahstheory@gmail.com, but received no response.

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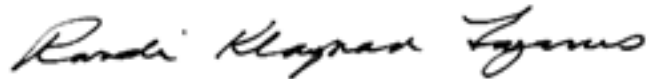
16. Berrena was informed that respondent had not been at that address for approximately 4 years and had not left any forwarding information.

17. As of the date of this Request for Issuance of Notice of Non-Compliance and Finding of Contempt, the respondent has willfully failed to

respond to an official Bar inquiry without good cause.

WHEREFORE, the undersigned Bar Counsel respectfully requests that this Grievance Committee issue its findings as to whether respondent has willfully failed to respond to an official Bar inquiry and whether respondent should be held in contempt for failure to respond to an official Bar inquiry.

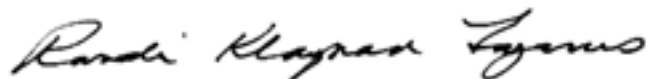
Respectfully submitted,



Randi Klayman Lazarus, Bar Counsel
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rlazarus@floridabar.org
smiles@floridabar.org

CERTIFICATE OF SERVICE

I certify this document has been furnished by regular U.S. Mail and email to respondent, Mary Michele Hudson, Maverick Law, LLC, 4440 PGA Blvd., Ste. 600, Palm Beach Gardens, FL 33410-6542; and via email to mavericklawllc@aol.com; and via email to Kenneth Patrick Hassett, Chair, at khassett@criminaldefense.cc; Jay Kim, Designated Reviewer, at jkim@kvllaw.com and to Staff Counsel, The Florida Bar, via email at psavitz@floridabar.org, dated this 8th day of November 2021.



Randi Klayman Lazarus, Bar Counsel



The Florida Bar

651 East Jefferson Street
Tallahassee, FL 32399-2300

Joshua E. Doyle
Executive Director

850/561-5600
www.FLORIDABAR.org

April 1, 2019

Ms. Mary Michele Hudson
Maverick Law, LLC
4440 PGA Blvd Ste 600
Palm Beach Gardens, FL 33410-6542

Re: Complaint by Helen Cammarata against Mary Michele Hudson
The Florida Bar File No. 2019-50,659 (15A)

Dear Ms. Hudson:

Enclosed is a copy of an inquiry/complaint and any supporting documents submitted by the above referenced complainant(s). Your response to this complaint is required under the provisions of Rule 4-8.4(g), Rules of Professional Conduct of the Rules Regulating The Florida Bar, and is due in our office by **April 15, 2019**. **Responses should not exceed 25 pages** and may refer to any additional documents or exhibits that are available on request. Failure to provide a written response to this complaint is in itself a violation of Rule 4-8.4(g). Please note that any correspondence must be sent through the U.S. mail; we cannot accept faxed material. **You are further required to furnish the complainant with a complete copy of your written response, including any documents submitted therewith.**

Pursuant to Rule 3-7.1(f), Rules of Discipline, you are further required to complete and return the enclosed Certificate of Disclosure form.

Finally, the filing of this complaint does not preclude communication between the attorney and the complainant(s). Please review the enclosed Notice for information on submitting your response.

Sincerely,

Richard W. Coombs, Bar Counsel
Attorney Consumer Assistance Program
ACAP Hotline 866-352-0707

Enclosures

cc: Ms. Helen Cammarata

The Florida Bar's Exhibit A

Pursuant to Rule 3-7.1(f), Rules of Discipline, you must execute the appropriate disclosure paragraph below and return the form to this office by **April 15, 2019**. The rule provides that the nature of the charges be stated in the notice to your firm; however, we suggest that you attach a copy of the complaint.

CERTIFICATE OF DISCLOSURE

I HEREBY CERTIFY that on this _____ day of _____, 201____, a true copy of the foregoing disclosure was furnished to _____, a member of my present law firm of _____, and, if different, to _____, a member of the law firm of _____, with which I was associated at the time of the act(s) giving rise to the complaint in The Florida Bar File No. 2019-50,659 (15A).

Mary Michele Hudson

CERTIFICATE OF DISCLOSURE
(Corporate/Government Employment)

I HEREBY CERTIFY that on this _____ day of _____, 201____, a true copy of the foregoing disclosure was furnished to _____, my supervisor at _____ (name of agency), with which I was associated at the time of the act(s) giving rise to the complaint in The Florida Bar File No. 2019-50,659 (15A).

Mary Michele Hudson

CERTIFICATE OF NON-LAW FIRM AFFILIATION
(Sole Practitioner)

I HEREBY CERTIFY to The Florida Bar on this _____ day of _____, 201____, that I am not presently affiliated with a law firm and was not affiliated with a law firm at the time of the act(s) giving rise to the complaint in The Florida Bar File No. 2019-50,659 (15A).

Mary Michele Hudson

NOTICE OF GRIEVANCE PROCEDURES

1. The enclosed letter is an official inquiry by bar counsel. Your response is required under Rule 4-8.4(g) of the Rules Regulating The Florida Bar. Rule 4-8.4(g)(1) and (2) require that a lawyer submit a written response within 15 days to an initial inquiry and within 10 days to any follow-up inquiry made by bar counsel, the grievance committee or the board of governors during the course of an investigation of the lawyer's conduct. If you do not respond, the matter will be forwarded to the grievance committee for disposition in accordance with Rule 3-7.3. Failure to respond may also be a matter of contempt and processed in accordance with Rule 3-7.11(f).
2. Many inquiries considered first by staff counsel are not forwarded to a grievance committee, as they do not involve violations of the Rules of Professional Conduct justifying disciplinary action.
3. Pursuant to Rule 3-7.1, any reports, correspondence, papers, recordings and/or transcripts of hearings submitted by you in this matter shall become accessible to the public upon dismissal or a decision by the grievance committee. Please advise Bar Counsel if you believe any material provided to The Florida Bar is confidential under applicable law and identify the basis of your claim that the material is confidential. Please note that The Florida Bar is required to acknowledge the status of proceedings during the pendency of an investigation, if a specific inquiry is made and the matter is deemed to be in the public domain.
4. The grievance committee is the Bar's "grand jury." Proceedings before the grievance committee are non-adversarial in nature. The grievance committee's function and procedures are set forth in Rule 3-7.4.
5. If the grievance committee finds probable cause, formal adversarial proceedings before the Supreme Court of Florida will be initiated pursuant to Rule 3-7.6. A referee will make a recommendation as to guilt and discipline to The Supreme Court of Florida, unless a plea is submitted pursuant to Rule 3-7.9.



The Florida Bar

651 East Jefferson Street
Tallahassee, FL 32399-2300

Joshua E. Doyle
Executive Director

850/561-5600
www.FLORIDABAR.org

April 1, 2019

Ms. Helen Cammarata
3189 Monterey Drive
Merrick, NY 11566

Re: Mary Michele Hudson; The Florida Bar File No. 2019-50,659 (15A)

Dear Ms. Cammarata:

Enclosed is a copy of our letter to Ms. Hudson which requires a response to your complaint.

Once you receive Ms. Hudson's response, you have 10 days to file a rebuttal if you so desire. **If you decide to file a rebuttal, you must send a copy to Ms. Hudson.** Rebuttals should not exceed 25 pages and may refer to any additional documents or exhibits that are available on request. Please address any and all correspondence to me. Please note that any correspondence must be sent through the U.S. mail; we cannot accept faxed material.

Please be advised that as an arm of the Supreme Court of Florida, The Florida Bar can investigate allegations of misconduct against attorneys, and where appropriate, request that the attorney be disciplined. The Florida Bar cannot render legal advice nor can The Florida Bar represent individuals or intervene on their behalf in any civil or criminal matter.

Please review the enclosed Notice on mailing instructions for information on submitting your rebuttal.

Sincerely,

Richard W. Coombs, Bar Counsel
Attorney Consumer Assistance Program
ACAP Hotline 866-352-0707

Enclosures

cc: Ms. Mary Michele Hudson

NOTICE OF GRIEVANCE PROCEDURES

1. The enclosed letter is an informal inquiry. Your response is required under the provisions of The Rules Regulating The Florida Bar 4 8.4(g), Rules of Professional Conduct. Failure to provide a written response to this complaint is in itself a violation of Rule 4 8.4(g). If you do not respond, the matter will be forwarded to the grievance committee for disposition in accordance with Rule 3-7.3 of the Rules of Discipline.
2. Many complaints considered first by staff counsel are not forwarded to a grievance committee, as they do not involve violations of the Rules of Professional Conduct justifying disciplinary action.
3. “Pursuant to Rule 3-7.1(a), Rules of Discipline, any response by you in these proceedings shall become part of the public record of this matter and thereby become accessible to the public upon the closure of the case by Bar counsel or upon a finding of no probable cause, probable cause, minor misconduct, or recommendation of diversion. Disclosure during the pendency of an investigation may be made only as to status if a specific inquiry concerning this case is made and if this matter is generally known to be in the public domain.”
4. The grievance committee is the Bar’s “grand jury.” Its function and procedure are set forth in Rule 3-7.4. Proceedings before the grievance committee, for the most part, are non-adversarial in nature. However, you should carefully review Chapter 3 of the Rules Regulating The Florida Bar.
5. If the grievance committee finds probable cause, formal adversarial proceedings, which ordinarily lead to disposition by the Supreme Court of Florida, will be commenced under 3-7.6, unless a plea is submitted under Rule 3-7.9.



The Florida Bar

Ft. Lauderdale Branch Office
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(954) 835-0233

Joshua E. Doyle
Executive Director

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www.FLORIDABAR.org

May 3, 2019

VIA E-Mail to mavericklawllc@aol.com

Ms. Mary Michele Hudson
Maverick Law, LLC
4440 PGA Blvd., Ste. 600
Palm Beach Gardens, FL 33410-6542

Re: Complaint of Helen Cammarata against Mary Michele Hudson
The Florida Bar File No. 2019-50,659 (15A)

Dear Ms. Hudson:

I am the Bar Counsel assigned to this file. An inquiry/complaint was filed against you by Helen Cammarata. A copy of this inquiry/complaint was sent to your record Bar address by U.S. Mail, however, that letter was returned to the Bar on April 15, 2019 marked 'return to sender not deliverable as addressed, unable to forward.' Enclosed you will find correspondence dated April 1, 2019, requiring a response. Please be advised that a written response is required pursuant to Rule 4-8.4(g) of the Rules Regulating The Florida Bar, and a response has not been received.

If a response is not received by **May 13, 2019**, this matter may be forwarded to the grievance committee for further investigation.

Sincerely,

Joi L. Pearsall
Bar Counsel

JP/es

Enclosures

cc: Helen Cammarata, Complainant



The Florida Bar

Ft. Lauderdale Branch Office
Lake Shore Plaza II
1300 Concord Terrace, Suite 130
Sunrise, Florida 33323
(954) 835-0233

Joshua E. Doyle
Executive Director

850/561-5600
www.FLORIDABAR.org

June 5, 2019

VIA E-Mail to mavericklawllc@aol.com and marymicheleHUDSON@aol.com

Ms. Mary Michele Hudson
Maverick Law, LLC
4440 PGA Blvd., Ste. 600
Palm Beach Gardens, FL 33410-6542

Re: Complaint of Helen Cammarata against Mary Michele Hudson
The Florida Bar File No. 2019-50,659 (15A)

Dear Ms. Hudson:

A bar complaint was filed against you by Helen Cammarata and a courtesy copy of that complaint is included with this letter. The Florida Bar previously sent letters to your record bar mailing address and/or your record bar email address. The Florida Bar has not received your response to our April 1, 2019 and May 2, 2019 letters. I have enclosed a copy of the Bar's April 1, 2019 and May 2, 2019 letters. Please be advised that a written response is required pursuant to Rule 4-8.4(g) of the Rules Regulating The Florida Bar.

If a response is not received by **June 17, 2019**, this matter may be forwarded to the grievance committee for further investigation.

Sincerely,

Joi L. Pearsall
Bar Counsel

JP/es

Enclosure

cc: Helen Cammarata, Complainant