

IN THE SUPREME COURT OF FLORIDA

THE FLORIDA BAR,

Petitioner,

v.

CHRISTOPHER MICHAEL
REYNOLDS,

Respondent.

Supreme Court Case
No. SC-

The Florida Bar File Nos.

- 2023-10,084 (6B)
- 2023-10,162 (6B)
- 2023-10,169 (6B)
- 2023-10,178 (6B)
- 2023-10,190 (6B)
- 2023-10,217 (6B)
- 2023-10,220 (6B)
- 2023-10,227 (6B)
- 2023-10,237 (6B)
- 2023-10,245 (6B)
- 2023-10,248 (6B)

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PETITION FOR EMERGENCY SUSPENSION

This petition of The Florida Bar (the bar) seeks emergency relief and requires the immediate attention of this Court under Rule 3-5.2 of the Rules Regulating The Florida Bar. The bar seeks the emergency suspension of Christopher Michael Reynolds, Attorney No. 60589, from the practice of law in Florida based on facts set forth in the sworn complaints of eleven (11) members of the public, attached hereto as Composite Exhibit 1, and the affidavit of Patrick M. Dougherty, C.P.A., attached hereto as Composite Exhibit 2, that establish clearly and convincingly that Christopher Michael

Reynolds has caused, or is likely to cause, immediate and serious harm to clients or the public as follows:

1. The bar's Executive Director authorized filing this Petition for Emergency Suspension.

2. Respondent, Christopher Michael Reynolds, is and, at all times the relevant conduct occurred was, a member of The Florida Bar subject to the jurisdiction and disciplinary rules of this Court.

3. Respondent is currently the subject of eleven (11) bar disciplinary matters, filed by clients and medical providers, which have been assigned The Florida Bar file numbers: 2023-10,084 (6B); 2023-10,162 (6B); 2023-10,169 (6B); 2023-10,178 (6B); 2023-10,190 (6B); 2023-10,217 (6B); 2023-10,220 (6B); 2023-10,227 (6B); 2023-10,237 (6B); 2023-10,245 (6B); 2023-10,248 (6B). *See Composite Exhibit 1.*

4. The bar's investigation of these matters has indicated respondent has abandoned his law practice without notice to his clients and without taking reasonable steps to protect their interests.

5. The bar complaints in Composite Exhibit 1 allege that respondent has ceased all communication with clients and has failed to distribute settlement funds to clients or third parties and support this Petition for Emergency Suspension. *See Composite Exhibit 1.*

6. Respondent has failed to respond to all the client complaints and has failed to respond to at least eight (8) official bar inquiries.

7. On November 2, 2022, a subpoena was issued as to respondent's business and IOTA accounts at Truist Bank.

8. On November 17, 2022, the bar received records corresponding to three of respondent's accounts at Truist Bank.

9. An audit of respondent's trust account records in conjunction with the received inquiry/complaints revealed the subjects of the inquiry/complaints to be owed a total of \$211,970.02. *See Composite Exhibit 2.*

10. On October 31, 2022, respondent's trust account ending in 0919 had a balance of \$1.07, respondent's trust account ending in 3839 had a balance of \$100.00, and respondent's operating account ending in 9482 had a negative balance of \$403.75. *See Composite Exhibit 2.*

11. Respondent has misappropriated client funds and/or failed to safekeep client property. *See Composite Exhibit 2.*

12. Respondent has abandoned his practice and clients and has failed to take reasonable steps to communicate with his clients in order to ensure the clients' interests are protected. *See Composite Exhibits 1 and 2.*

13. Respondent's conduct above violated the following Rules Regulating The Florida Bar: Rule 4-1.3 (Diligence); Rule 4-1.4 (Communication); Rule 4-1.15 (Safekeeping Property); Rule 4-1.16 (Declining or Terminating Representation); Rule 4-8.4(a) (Misconduct-a lawyer shall not violate the Rules of Professional Conduct); Rule 4-8.4(c) (Misconduct- a lawyer shall not engage in conduct involving dishonesty, fraud, deceit, or misrepresentation); Rule 4-8.4(d) (Misconduct-a lawyer shall not engage in conduct in connection with the practice of law that is prejudicial to the administration of justice); Rule 4-8.4(g) (Misconduct -a lawyer shall not fail to respond, in writing, to any official inquiry by bar counsel or disciplinary agency); and Rule 5-1.1(b) (Application of Trust Funds or Property to Specific Purpose); Rule 5-1.1(e) (Trust Accounts-notice of receipt of trust funds; delivery; accounting).

The above facts show that respondent has caused, or is likely to cause, immediate and serious harm to clients or the public and immediate action must be taken to protect respondent's clients and the public. Therefore, under Rule 3-5.2, the bar respectfully requests this Court issue an order suspending respondent from the practice of law until further order of this Court and ordering the respondent to:

A. Immediately:

- accept no new clients from the date of this Court's order of emergency suspension;
- initiate no litigation on behalf of clients from the date of this Court's order of emergency suspension;
- provide a copy of this Court's order of emergency suspension to all courts, tribunals, or adjudicative agencies before which Christopher Michael Reynolds is counsel of record; all state, federal, or administrative bars of which respondent is a member; all clients; all co-counsel; and all opposing counsel, as required by Rule 3-5.1(h);
- cease withdrawing or disbursing any money from any trust account or other financial institution account holding funds of clients or third parties in respondent's possession in connection with legal representation or funds of third parties in connection with respondent's service as a fiduciary including, but not limited to, personal representative, guardian, or trustee, until further order of this Court, a judicial referee appointed by this Court, or by order of the circuit court in an inventory attorney proceeding instituted under Rule 1-3.8;

- not transfer any ownership of any real or personal property purchased in whole or in part with funds of clients or third parties in connection with legal representation or with funds of third parties in connection with respondent's service as a fiduciary including, but not limited to, personal representative, guardian, or trustee, without approval of this Court, a judicial referee appointed by this Court, or by order of the circuit court in an inventory attorney proceeding instituted under Rule 1-3.8;
- deposit any fees or other sums received in connection with the practice of law or employment as a personal representative, guardian, or trustee, by the respondent on or after the date of this Court's order of emergency suspension into a specified trust account from which withdrawal may only be made by order of this Court, a judicial referee appointed by this Court, or by order of the circuit court in an inventory attorney proceeding instituted under Rule 1-3.8;
- provide a copy of this Court's order of emergency suspension to all banks and financial institutions where the respondent maintains any account holding funds of clients or third parties in respondent's possession in connection with representation or funds of third

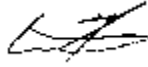
- parties in connection with respondent's service as a fiduciary including, but not limited to, personal representative, guardian, or trustee;
- comply with, and provide all documents and testimony responsive to, a subpoena from the bar for trust account records and any related documents necessary for the bar to conduct a trust account audit;
 - authorize any referee appointed in these proceedings to determine entitlement to funds in any trust accounts frozen as a result of an order entered in this matter; and
 - turn over to any successor the complete financial records of any estate, guardianship, or trust in which respondent served as a fiduciary on the successor's appointment;
 - cease holding yourself out as a Florida Bar member or lawyer and eliminate all indicia of respondent's status as a Florida Bar member or lawyer on websites, email, social media, telephone listings, stationery, checks, business cards, office signs, email address, and any other indicia of respondent's status as a Florida Bar member or lawyer; and

B. Within 30 days from the date of this Court's order of emergency suspension:

- cease all practice of law in Florida;
- withdraw from representation of all clients;
- wind down all pending matters;
- cease acting as a fiduciary, including, but not limited to, personal representative for any estate, guardian for any ward, and trustee for any trust;
- provide Staff Counsel with an affidavit listing all of the following that respondent notified of this Court's order of emergency suspension: all courts, tribunals, or adjudicative agencies of which respondent is a member; all state, federal, or administrative bars of which respondent is a member; all clients; all co-counsel; and all opposing counsel.
- provide bar counsel in this case with an affidavit listing each bank or financial institution respondent provided with a copy of this Court's order of emergency suspension; and
- notify bar counsel in this case of the receipt and location of any fees or other sums received in connection with the practice of law or in connection with respondent's service as a fiduciary, including,

but not limited to, personal representative, guardian, or trustee,
received by respondent after issuance of this Court's order of
emergency suspension.

Respectfully submitted,



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/s/

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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, with a copy provided via email to respondent, Christopher Michael Reynolds, at creynolds@chrisreynoldslaw.com; and that a copy has been provided by United States Mail via certified mail No. 7020 1810 0000 0813 3419, return receipt requested to respondent, Christopher Michael Reynolds, whose record bar address is 11125 Park Blvd Ste 104-226, Seminole, FL 33772-4700 and via email to Evan D. Rosen, Bar Counsel, erosen@floridabar.org, on this 6th day of December, 2022.



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NOTICE OF DESIGNATION OF PRIMARY EMAIL ADDRESS

Bar counsel in this matter is Evan D. Rosen, Bar Counsel, whose address, telephone number and primary email address are The Florida Bar, Tampa Branch Office, 2002 N. Lois Ave., Suite 300, Tampa, Florida 33607-2386, (813) 875-9821 and erosen@floridabar.org. Respondent need not address pleadings, correspondence, etc. in this matter to anyone other than bar counsel and to Patricia Ann Toro Savitz, Staff Counsel, The Florida Bar, 651 E. Jefferson Street, Tallahassee, FL 32399-2300, psavitz@floridabar.org.

MANDATORY ANSWER NOTICE

RULE 3-5.2(a), OF THE RULES REGULATING THE FLORIDA BAR,
PROVIDES THAT A RESPONDENT MUST ANSWER A COMPLAINT.