

**The Florida Bar
Inquiry/Complaint Form**

**STOP - PLEASE DOWNLOAD THIS FORM TO YOUR COMPUTER BEFORE
FILLING IT OUT.**

PART ONE (See Page 1, PART ONE – Complainant Information.):

Your Name: Megan Wagner

Organization: N/A

Address: 1739 20th Avenue N

City, State, Zip Code: St. Petersburg, Florida 33713

Phone: 716.864.8177

Email: itsmeganwagner@gmail.com

ACAP Reference No.: N/A

Does this complaint pertain to a matter currently in litigation? Yes _____ No X

PART TWO (See Page 1, PART TWO – Attorney Information.):

Attorney's Name: Christopher Michael Reynolds Florida Bar No. 60589

Address: Chris Reynolds Law, 11125 Park Blvd Ste 104-226

City, State, Zip Code: Seminole, Florida 33772-4700

Phone: Office: 727-777-7737, Cell: 727-249-8815

**PART THREE (See Page 1, PART THREE – Facts/Allegations.): The specific thing or things I
am complaining about are: (attach additional sheet).**

**PART FOUR (See Page 1, PART FOUR – Witnesses.): The witnesses in support of my
allegations are: (attach additional sheet).**

PART FIVE (See Page 1, PART FIVE – Acknowledge Oath and Signature.):



YOU MUST PLACE YOUR MARK IN THE BOX ACKNOWLEDGING THE OATH AND
YOU MUST SIGN YOUR FULL NAME BELOW.

**Under penalties of perjury, I declare that the foregoing facts are true, correct and
complete.**

Megan Wagner
Print Name

Signature
08/04/2022
Date

*Having trouble? Download the form and open the document in Adobe Acrobat™.

RECEIVED, 12/06/2022 01:00:24 PM, Clerk, Supreme Court

FL Bar Complaint | Summary

Megan Wagner

1739 20th Avenue N
St. Petersburg, FL 33713-5029
716.864.8177
itsmeganwagner@gmail.com

The Florida Bar

Attn: ACAP

651 East Jefferson Street
Tallahassee, Florida 32399-2300

August 4, 2022

To Whom It May Concern -

I am writing this letter to serve as the opening of my formal complaint against Christopher Michael Reynolds, Florida Bar Number 60589, of Chris Reynolds Law. The attached form and supporting documents are intended to provide information about Mr. Reynolds having settled my personal injury case without my knowledge or consent by falsely representing to the at-fault driver's insurance company that I agreed to a settlement, as well as forging my signature and self-notarizing a settlement document that I did not approve, and in fact, had never seen. He then received and cashed the settlement check, again, without my knowledge.

Please kindly review the attached information and let me know if there are any questions or if further clarification is needed in order to research and verify his actions.

Thank you for your time.

Megan Wagner

The Florida Bar Inquiry/Complaint Form

STOP - PLEASE DOWNLOAD THIS FORM TO YOUR COMPUTER BEFORE FILLING IT OUT.

PART ONE (See Page 1, PART ONE – Complainant Information.):

Your Name: Stephen G. Mortimer

Organization: Rahdert Mortimer, PLLC

Address: 535 Central Ave

City, State, Zip Code: St. Petersburg, FL 33701

Phone: (727) 215-9473

Email: smortimer@rahdertlaw.com

ACAP Reference No.: _____

Does this complaint pertain to a matter currently in litigation? Yes X No _____

PART TWO (See Page 1, PART TWO – Attorney Information.):

Attorney's Name: Christopher M. Reynolds Florida Bar No. _____

Address: 7178 Seminole Boulevard (Mailing address: 11125 Park Blvd, Ste. 104-226, Seminole, FL 33772)

City, State, Zip Code: Seminole, FL 33772

Phone: (727) 777-7737 office; (727) 249-8815 cell

PART THREE (See Page 1, PART THREE – Facts/Allegations.): The specific thing or things I am complaining about are: (attach additional sheet).

PART FOUR (See Page 1, PART FOUR – Witnesses.): The witnesses in support of my allegations are: (attach additional sheet).

PART FIVE (See Page 1, PART FIVE – Acknowledge Oath and Signature.):



YOU MUST PLACE YOUR MARK IN THE BOX ACKNOWLEDGING THE OATH AND YOU MUST SIGN YOUR FULL NAME BELOW.

Under penalties of perjury, I declare that the foregoing facts are true, correct and complete.

Steve Mortimer

Print Name
Stephen G. Mortimer Digitally signed by Stephen G. Mortimer
Date: 2022.10.06 14:25:13 -04'00'

Signature
10/06/2022

Date

*Having trouble? Download the form and open the document in Adobe Acrobat™.

**IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA
CIVIL DIVISION**

TYLER TITUS,

Plaintiff,

vs.

Case No.:

Division:

**CHRISTOPHER M. REYNOLDS,
an individual; and CHRIS REYNOLDS
LAW, PLLC,**

Defendants.

_____ /

COMPLAINT

COMES NOW the Plaintiff, TYLER TITUS (hereinafter “Plaintiff”), by and through the undersigned counsel, and sues the Defendants, CHRISTOPHER M. REYNOLDS, an individual (“REYNOLDS”), and CHRIS REYNOLDS LAW, PLLC (“CRL”) (collectively “Defendants”), pursuant to the Florida Civil Theft statute to recover damages for unlawful and unwarranted theft of personal property. In support thereof, Plaintiff states as follows:

GENERAL ALLEGATIONS

1. This is an action for damages that exceeds Thirty Thousand (\$30,000.00) Dollars, exclusive of costs, interest and attorneys’ fees; and in all respects meets or exceeds the jurisdiction requirements of this Court pursuant to Florida Statutes § 26.012.

2. This Court has personal jurisdiction over Defendants because: (a) Defendants are operating, present, and/or doing business within this jurisdiction, (b) Defendants both reside within this jurisdiction, and (c) Defendants’ breaches and tortious activity occurred within this jurisdiction.

3. Venue of this action is proper and maintainable in this Court pursuant to Florida Statutes §§ 47.011, *et seq.*, as the causes of action pled herein accrued in Pinellas County, Florida; and both Defendants reside in Pinellas County, Florida

4. Plaintiff is an individual domiciled in Pinellas County, Florida, and is *sui juris*.

5. At all times material hereto, Defendant, REYNOLDS, is an individual domiciled in Pinellas County, Florida, is a citizen of the State of Florida; and is *sui juris*. At all times material hereto, REYNOLDS was the founder, owner, operator, and manager of CRL. In addition, REYNOLDS conducted business in Pinellas County, Florida.

6. In essence, REYNOLDS and CRL are one-and-the-same. CRL is an “alter ego” of REYNOLDS, who dominates and controls the corporate entity to further a fraudulent scheme and to further REYNOLDS’ own personal financial interests. The company’s existence independent of REYNOLDS is, in fact, non-existent.

7. Defendant, REYNOLDS, is an attorney.

8. Defendant, REYNOLDS, previously represented Plaintiff, TYLER TITUS, regarding a personal injury claim occurring on or about April 24, 2021.

9. Defendant, REYNOLDS, settled the personal injury claim in the amount of \$100,000.00. He waived his costs and therefore the amount due to the Plaintiff is \$66,666.66.

10. Undersigned counsel has repeatedly called, texted and emailed Defendant, REYNOLDS, over the last two months, to no avail.

11. Defendant, REYNOLDS, individually, had no right to keep money that he received on behalf of Plaintiff.

12. Defendant, CRL, had no right to keep money that it received on behalf of Plaintiff.

13. There is no lawful basis for Defendant, REYNOLDS, failing to return money which does not belong to him.

14. As a result of the above-cited actions, omissions and misrepresentations, Plaintiff has been damaged in an amount exceeding One Hundred Ninety-Nine Thousand, Nine Hundred and Ninety-Nine Dollars and 98/100 (\$199,999.98).

15. Plaintiff has duly performed all of his duties and obligations; and any conditions precedent to Plaintiff bringing this action have occurred, have been performed, or else have been excused or waived.

16. To enforce his rights, Plaintiff has retained undersigned counsel and is obligated to pay counsel a reasonable fee for its services, for which Defendants are liable as a result of their bad faith, the statutory violations set forth below, and otherwise.

COUNT I – VIOLATION OF FLORIDA’S CIVIL THEFT STATUTE
(FLA. STAT. § 772.11)

17. Plaintiff repeats and hereby incorporates the above paragraphs.

18. Fla. Stat. § 812.014 (“Theft”) provides, in pertinent part:

- (1) A person commits theft if he or she knowingly obtains or uses, or endeavors to obtain or to use, the property of another with intent to, either temporarily or permanently:*
 - (a) Deprive the other person of a right to the property or a benefit from the property.*
 - (b) appropriate the property to his or her own use or the use of any person not entitled to the use of the property.*

19. Pursuant to §812.014(2)(a), it is a first degree felony if the property stolen is valued at \$100,000 or more.

20. Fla. Stat. §772.11 (“Civil Remedy for theft or exploitation”) provides, in pertinent part:

Any person who proves by clear and convincing evidence that he or she has been injured in any fashion by reason of any violation of ss. 812.012-812.037 or s. 825.103(1) has a cause of action for threefold the actual damages sustained and, in any such action, is entitled to minimum damages in the amount of \$200, and reasonable attorney's fees and courts costs in the trial and appellate courts. Before filing an action for damages under this section, the person claiming injury must make a written demand for \$200 or the treble damage amount of the person liable for damages under this section. If the person to whom a written demand is made complies with such demand within 30 days after receipt of the demand, that person shall be given a written release from further civil liability for the specific act of theft or exploitation by the person making the written demand.

21. As set forth above, Plaintiff has been injured by Defendants' violation of Fla. Stat. § 812.014, *et seq.*

22. Defendants knowingly obtained or used, or endeavored to obtain or use, Plaintiff's property with "felonious intent," either temporarily or permanently, to deprive Plaintiff of his right to or a benefit from the property or appropriate the property to Defendants' own use.

23. On July 28, 2022, Plaintiff presented Defendants a formal written demand under Fla. Stat. § 772.11 for payment to Plaintiff of the monies that were wrongfully retained. As set forth in Plaintiff's July 28, 2022 demand letter, the amount that was subject to the Florida Civil Theft statute was \$66,666.66. (See **Exhibit "A"** hereto).

24. As of the date of filing this lawsuit, which is more than thirty (30) days after the date on which written demand was served, Plaintiff's demand for delivery of his property has gone unfulfilled, as Defendants have not delivered the monies to Plaintiff.

25. As a direct and proximate result of Defendants' actions, Plaintiff has suffered damage.

26. Pursuant to Fla. Stat. § 772.11, Plaintiff is entitled to recover from Defendants three times the current monetary value in compensatory damages for which Defendants would otherwise be liable. The treble damages total is a sum of at least \$199,999.98.

27. Pursuant to Fla. Stat. § 772.11, Plaintiff is also entitled to recover from Defendants the reasonable amount of attorneys' fees Plaintiff has incurred in representing his interests in this matter.

WHEREFORE, Plaintiff, TYLER TITUS, demands judgment against Defendants, CHRISTOPHER M. REYNOLDS, an individual, and CHRIS REYNOLDS LAW, PLLC, for an amount within the jurisdictional limits of this court, to-wit: More than Thirty Thousand Dollars (\$30,000.00), including an award of interest and an award of attorneys' fees and costs pursuant to Fla. Stat. § 772.11, and for such other relief to which the Plaintiff may be justly entitled.

DEMAND FOR JURY TRIAL

Plaintiff demands trial by jury in this action of all issues so triable.

RESERVATION OF RIGHTS

Plaintiff reserves the right to further amend this Complaint, upon completion of his investigation and discovery, to assert any additional claims for relief against Defendants as may be warranted under the circumstances and as allowed by law.

Dated: August 30, 2022.

/s/ Stephen G. Mortimer

Stephen G. Mortimer, Esquire

Florida Bar Number: 138606

RAHDERT & MORTIMER, PLLC

The Alexander Building

535 Central Avenue

St. Petersburg, FL 33701

Telephone: (727) 823-4191

Facsimile: (727) 513-5600

Primary: servicemort@rahdertlaw.com

Secondary: tpham@rahdertlaw.com

Attorney for Plaintiff

The Florida Bar Inquiry/Complaint Form

STOP - PLEASE DOWNLOAD THIS FORM TO YOUR COMPUTER BEFORE FILLING IT OUT.

PART ONE (See Page 1, PART ONE – Complainant Information.):

Your Name: SHANDELIA PETERS

Organization: _____

Address: 2122 BRADFORD ST APT 504

City, State, Zip Code: CLEARWATER, FL 33760

Phone: 727-318-7669

Email: SMPETERS.FL@GMAIL.COM

ACAP Reference No.: 23-3854

Does this complaint pertain to a matter currently in litigation? Yes X No _____

PART TWO (See Page 1, PART TWO – Attorney Information.):

Attorney's Name: CHRISTOPER M REYNOLDS Florida Bar No. #60589

Address: 11125 PARK BLVD STE 104-226

City, State, Zip Code: SEMINOLE, FL 33772-4700

Phone: OFFICE: 727-777-7737 CELL: 727-249-8815 FAX: 727-873-0986

PART THREE (See Page 1, PART THREE – Facts/Allegations.): The specific thing or things I am complaining about are: (attach additional sheet).

PART FOUR (See Page 1, PART FOUR – Witnesses.): The witnesses in support of my allegations are: (attach additional sheet).

PART FIVE (See Page 1, PART FIVE – Acknowledge Oath and Signature.):



YOU MUST PLACE YOUR MARK IN THE BOX ACKNOWLEDGING THE OATH AND YOU MUST SIGN YOUR FULL NAME BELOW.

Under penalties of perjury, I declare that the foregoing facts are true, correct and complete.

SHANDELIA PETERS
Print Name

Signature

10/11/2022
Date

PART THREE:

Timeline of Events Leading to Complaint:

1. Was rear ended in auto accident on 1/10/20
2. Retained Christopher Reynolds on 1/12/2020, we met at my father's residence with him as a witness.
3. Sought medical care for injuries with several providers with the lawyer's recommended providers.
4. Was advised that Geico (my insurance) paid out personal coverage max for PIP and Allstate (other driver) paid out the \$100,000 payout. 10/12/2020
5. Made several attempts to contact Mr. Reynolds for status updates. Between October 2020 and February 2021.
6. 10/13/2020 - Mr. Reynolds informed me that he was attempting to sever some of the medical claims and negotiate the fees down. Please see screenshot that says I should be getting a "nice amount for sure." (**See attachment below**)
7. 2/5/21 Mr. Reynolds paid out a partial disbursement for \$10,000 to me due to the severe financial hardships as a result of the accident. Lost my employment, had mental health breakdown requiring a long-term in-patient stay due to all of the loss from the accident etc.
8. May 2022 again attempted to contact Mr. Reynolds to check in on progress and only after I emailed him and cc'd the Florida State Bar did I then get a what seemed as panicked response and advised me that my emails had been going to "spam." He advised me to call his cellphone. I then communicated through text with no response.
9. On 9/30/22 Dr. Harrington office manager (chiropractor provider) left a voicemail advising me they were unable to reach Mr. Reynolds to negotiate and/or receive any payment from him and/or the settlement funds.
10. I attempted calling Mr. Reynolds office phone upon receiving this voicemail and the office phone is ringing as disconnected. I also was able to forward him the original voicemail to his phone through text message. (**See attachment below**)
11. I have sent texts on 9/16/22, 10/1/22, and 10/3/22. - with no answer, I went months with no contact or status updates or kept aware of what was happening with my case, all I had known was that it was settled and paid out at the max and we were just waiting to be able to negotiate the bills down for final payment.
12. Now the iPhone shows that Mr. Reynolds has "silenced" my notifications. (**See attachment below**)
13. I will be filing for bankruptcy within the next 30-days and they will ask about pending litigation/settlements and any and all outstanding debts. I have been advised, that as part of this process that the trustee assigned to the bankruptcy may need to take over the file. However, I have no data or information on outstanding creditors and what has been paid or negotiated.
14. I am concerned with the funds held in escrow, if they are still there, what if any providers have been paid out. What debts are outstanding. These are all questions I have not been able to resolve and there has been a total lack of transparency with this case.
15. I am personally aware of a substance use issue Mr. Reynolds previous had, and when I contracted him, I was informed he was in active recovery. I fear that he may have slipped back into his addiction, as the lack of movement and communication is a classic indicator and commonality of active substance use. As well as the total avoidance. He was referred to me by a colleague who also happened to be sober and knows him in this manner. I know the bar has strict policies and guidelines about practicing and sobriety, and ways to support those in practice who also struggle with a substance use disorder.
16. There is a letter for a "partial disbursement" that was not explained to me, that in tiny print at the bottom, seems to be worded such that it releases Mr. Reynolds of liability. **Please see attached letter.** This was never discussed or given any legal advice in regard to how this would impact me as a client. I believe that this is an intentional and overt act to release him from the case and an unethical act of deceit and malfeasance and in direct opposition to the standards one should hold as a practicing attorney.
17. I need the full case file with any and all outstanding debt, provider payment records and the balance in the escrow account along with any attorney fees that were taken for my bankruptcy filings.
18. **See images below for supporting documentation:** If any of the images need improved quality or visibility, I can work to get those to the bar for review.

Lastly, as I am in the process of filing for bankruptcy, I have my phone set to not accept any incoming calls from unknown numbers, due to the numerous creditor calls. Please leave a message with a good return contact number or please email me at smpeters.fl@gmail.com to follow up on this matter.

**The Florida Bar
Inquiry/Complaint Form**

STOP - PLEASE DOWNLOAD THIS FORM TO YOUR COMPUTER BEFORE FILLING IT OUT.

PART ONE (See Page 1, PART ONE – Complainant Information.):

Your Name: Misti Scott

Organization: _____

Address: 9001 Baywood Park Dr.

City, State, Zip Code: Seminole FL 33777

Phone: 727-642-9006

Email: mistimscott@gmail.com

ACAP Reference No.: _____

Does this complaint pertain to a matter currently in litigation? Yes _____ No X

PART TWO (See Page 1, PART TWO – Attorney Information.):

Attorney's Name: Chris Reynolds Florida Bar No. 60589

Address: 11125 Park Blvd. St 104-226

City, State, Zip Code: Seminole FL 33772

Phone: 727-777-7737 Cell 727-244-8815

PART THREE (See Page 1, PART THREE – Facts/Allegations.): The specific thing or things I am complaining about are: (attach additional sheet).

PART FOUR (See Page 1, PART FOUR – Witnesses.): The witnesses in support of my allegations are: (attach additional sheet).

PART FIVE (See Page 1, PART FIVE – Acknowledge Oath and Signature.):



YOU MUST PLACE YOUR MARK IN THE BOX ACKNOWLEDGING THE OATH AND
YOU MUST SIGN YOUR FULL NAME BELOW.

Under penalties of perjury, I declare that the foregoing facts are true, correct and complete.

Misti Monique Scott

Print Name

Misti Monique Scott

Signature

Date

9/26/22

October 5, 2022

To Whom It May Concern:

I am filing a complaint against Attorney Chris Reynolds for settling my case without my permission and for cashing the settlement check from Geico but not disbursing the funds to my providers or myself. These actions have been verified and proof provided by Geico.

Attorney: Chris Reynolds FL Bar #60589
Chris Reynolds Law
11125 Park Blvd. St. 104-226
Seminole, FL 33772
727-777-7737 Ph 727-249-8815 Cell

Date of Accident: 12/29/2018

At Fault party: Dawn Worley-Geico Insurance, Geico Insurance

Injured party: Misti Scott, USAA Insurance

Exhibit A Text thread between Attorney Reynolds and myself; Exhibit B-D are items seen as black area in text thread and are named as such in order of appearance in thread from oldest to newest.

The text thread between my attorney and myself shows how communication decreased significantly in the year 2021 and completely stopped after September 2021. Per our conversations, I understood that the negotiations can take several months at a time to get replies to demand letters, so I was not being pushy with follow up messages. Our last phone conversation (9/2/21) I recall saying that I would go back to Dr. Anthony, who treated my shoulder injury, but due to the ages of my children and demands of caring for them I would not likely undergo surgery at any time in the near future. I explained that just isn't feasible for me to undergo surgery, recovery and rehabilitation.

On July 21, 2022, my provider, Dr. Steven Wyckoff Vitality Chiropractic & Wellness Center, asked me at my appointment if I had heard anything from Attorney Reynolds regarding my case, updates, or anything at all. They had been trying to contact him for some time with no return call from his office (the answering service always took a message and promised a return call), no response to text messages, etc. This conversation prompted me to text him. I was shocked at that time when I realized it had been 10 months since I had any communication with him. I sent a message asking for an update and indicated again I would likely not be seeking surgery and would like to talk about closing my case out. I waited several weeks and again Dr. Wyckoff's office inquired if I had had any success in contacting him as they still had not. I tried calling the office and the answering service took a message and promised a call back. On Monday Sept. 19, 2022, I sent another text asking for a return call with no response.

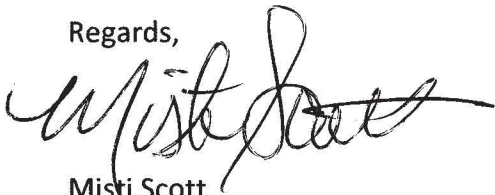
On September 19, 2022 I contacted Carey, Leisure and Neal Attorneys, on the referral of a friend, to see if they had any guidance for what I should do in this matter. I was informed by them that statute of limitations for my case is coming to an end Dec. 29, 2022. They agreed to help me by taking my case, stating a lawsuit must be filed immediately due to the lapse in time since my accident. Upon doing so, they contacted Geico, the at fault party's insurance. At that time, they were told the case had been settled on October 20, 2021 and the payment disbursed to Chris Reynolds Law (Exhibit E). They stated they included a release that Reynolds was to have me sign and that they have never received the release from Reynolds with my signature. Included is a demand letter from Attorney Reynolds on Oct. 19, 2021 stating I am not pursuing surgery at this time and I will settle for \$35,000 (Exhibit F). By the letter from Geico on October 20, 2021 you can see that a check was mailed as settlement for my case (Exhibit E Page 5).

At no time, did Chris Reynolds communicate with me what Geico's response to his last demand letter was. I did not authorize him to settle the case on my behalf. Additionally, I did not sign a release, nor did I receive any disbursement from the settlement. My provider has outstanding fees to be paid, further supporting my claim that Attorney Reynolds acted without my permission to settle my case, received my settlement and failed to pay my providers or myself what we were due to receive.

Initial investigation has turned up a civil lawsuit against Attorney Reynolds where another client settled and has yet to be paid the approximately \$66,000 he is owed. It appears that Reynolds has kept/stolen that money from the client.

Thank you for your prompt attention to this matter. I look forward to your assistance with this complaint.

Regards,

A handwritten signature in black ink, appearing to read 'Misti Scott', with a stylized, flowing script.

Misti Scott
9001 Baywood Park Dr.
Seminole, FL 33777
727-642-9006 cell

**The Florida Bar
Inquiry/Complaint Form**

STOP - PLEASE DOWNLOAD THIS FORM TO YOUR COMPUTER BEFORE FILLING IT OUT.

PART ONE (See Page 1, PART ONE – Complainant Information.):

Your Name: Dustin Gilbert
Organization: _____
Address: 3042 Marlo Blvd.
City, State, Zip Code: Clearwater, FL 33759
Phone: 541-520-7326
Email: dgilbert812@yahoo.com
ACAP Reference No.: _____
Does this complaint pertain to a matter currently in litigation? Yes _____ No x

PART TWO (See Page 1, PART TWO – Attorney Information.):

Attorney's Name: Chris Reynolds Florida Bar No. 60589
Address: 7178 Seminole Blvd
City, State, Zip Code: Seminole, FL 33772
Phone: 727-777-7737

PART THREE (See Page 1, PART THREE – Facts/Allegations.): The specific thing or things I am complaining about are: (attach additional sheet).

PART FOUR (See Page 1, PART FOUR – Witnesses.): The witnesses in support of my allegations are: (attach additional sheet).

PART FIVE (See Page 1, PART FIVE – Acknowledge Oath and Signature.):



YOU MUST PLACE YOUR MARK IN THE BOX ACKNOWLEDGING THE OATH AND
YOU MUST SIGN YOUR FULL NAME BELOW.

Under penalties of perjury, I declare that the foregoing facts are true, correct and complete.

Dustin Gilbert
Print Name
[Signature]
Signature
10/26/2022
Date

Facts/Allegations

I am filing a complaint against Chris Reynolds for unethical practices, forgery, and settling my case without authorization or permission. Chris Reynolds settled my case with Uber without my knowledge or permission for \$70,000. He also settled with the at fault party for \$25,000 without my knowledge or permission. I was made aware of these facts from my current attorney Stephanie Vasile at Carey, Leisure and Neal law firm. 727-472-4735

Exhibit A- My signature on this document was forged and notarized by Chris Reynolds.

The Florida Bar Inquiry/Complaint Form

STOP - PLEASE DOWNLOAD THIS FORM TO YOUR COMPUTER BEFORE FILLING IT OUT.

PART ONE (See Page 1, PART ONE – Complainant Information.):

Your Name: Ashtyn Smith

Organization: Conch Republic Grill

Address: 16699 Gulf Blvd

City, State, Zip Code: North Redington Beach, 33708

Phone: 727-418-7375

Email: ashtynjillian@gmail.com

ACAP Reference No.: _____

Does this complaint pertain to a matter currently in litigation? Yes yes No _____

PART TWO (See Page 1, PART TWO – Attorney Information.):

Attorney's Name: Christopher Reynolds Florida Bar No. 60589

Address: 7178 Seminole Blvd

City, State, Zip Code: Seminole, FL, 33772

Phone: 727-249-8815

PART THREE (See Page 1, PART THREE – Facts/Allegations.): The specific thing or things I am complaining about are: (attach additional sheet).

PART FOUR (See Page 1, PART FOUR – Witnesses.): The witnesses in support of my allegations are: (attach additional sheet).

PART FIVE (See Page 1, PART FIVE – Acknowledge Oath and Signature.):



YOU MUST PLACE YOUR MARK IN THE BOX ACKNOWLEDGING THE OATH AND YOU MUST SIGN YOUR FULL NAME BELOW.

Under penalties of perjury, I declare that the foregoing facts are true, correct and complete.

Ashtyn Smith
Print Name

Signature
Ashtyn Smith

Date

Received Wed 11/09/2022 4:28PM
From ashtyn smith
Subject Re: Chris Reynolds Bar Complaint
To ACAPIntake
cc
bcc

I have been having problems regarding any form of communication from Chris Reynolds. So after being reached out by my doctors offices' for the accident that happened on April 1st, 2021, I tried to reach out to him and all his phones went straight to voicemail. As well as his office phone being disconnected completely. Not only were his phones disconnected but you can tell that also he wouldn't respond to any form of communication; regarding email, cell phone, work phone, text messages, even instagram direct message.

After multiple attempts to reach out, I then got new representation from a different firm. After a few weeks of them representing me, they came to the conclusion that Chris Reynolds cashed a check for my settlement on August 28th 2022. for \$12,800. Not only that, he forged my signature for the \$20,000 release.

At this point, I have also filed a police report, and I am also in the midst of filing a report with the notary board as well considering he notarized my signature that he forged.

Thank you for your time in regards to reading my scenario. If there is anything else you may need please feel free to reach back out at any time.

On Wed, Nov 9, 2022 at 4:13 PM ashtyn smith <ashtynjillian@gmail.com> wrote:

- Hello,
- Attached are the documents you requested. Please let me know if there is any more information you need from me. These are all the documents regarding my communication with Chris Reynolds. As well, proof of the documents he used to forge my signature on the release form.

Let me know if you need anything else, thank you.

**The Florida Bar
Inquiry/Complaint Form**

**STOP - PLEASE DOWNLOAD THIS FORM TO YOUR COMPUTER BEFORE
FILLING IT OUT.**

PART ONE (See Page 1, PART ONE – Complainant Information.):

Your Name: Troy Perez

Organization: City of Tampa

Address: 371 Audubon Oaks Dr, Building 7 Apt 105

City, State, Zip Code: Lakeland, FL, 33809

Phone: 813-454-8472

Email: Troyperez@usf.edu

ACAP Reference No.: 23-4514

Does this complaint pertain to a matter currently in litigation? Yes _____ No ✓

PART TWO (See Page 1, PART TWO – Attorney Information.):

Attorney's Name: Chris Reynolds Florida Bar No. 60589

Address: 11125 Park Blvd Ste 104-226

City, State, Zip Code: Seminole, FL 33772-4700

Phone: 727-777-7737

PART THREE (See Page 1, PART THREE – Facts/Allegations.): The specific thing or things I am complaining about are: (attach additional sheet).

PART FOUR (See Page 1, PART FOUR – Witnesses.): The witnesses in support of my allegations are: (attach additional sheet).

PART FIVE (See Page 1, PART FIVE – Acknowledge Oath and Signature.):



**YOU MUST PLACE YOUR MARK IN THE BOX ACKNOWLEDGING THE OATH AND
YOU MUST SIGN YOUR FULL NAME BELOW.**

Under penalties of perjury, I declare that the foregoing facts are true, correct and complete.

Troy Perez

Print Name

Troy Perez

Signature

11/04/2022

Date

***Having trouble? Download the form and open the document in Adobe Acrobat™.**

The attorney has failed to contact me within a reasonable time frame. I have attempted to call his cell phone, office phone, emails and Facebook messages but have not heard back. The office phone continually rings and does not allow someone to leave a voicemail. I went and visited his office, but the door is locked, and the office appears to be vacant. The business owners next door was asked if they had seen him and the only thing that was said was that he has not been around and that many people were looking for him.

I was under the assumption the case was still open when I came across Facebook posts stating that he is a criminal, and cases were being closed without advising clients. Several people had similar issues and it had all happened recently. I got in contact with a couple individuals who shared their story and was baffled that this was happening. I called my insurance company but have not been able to get in contact with any claim adjustor that knows about my case, but the mobile app says the claim had closed months prior. I did not sign or authorize the closure of my claim with progressive. I called USAA, the at fault drivers' insurance company, and the representative advised that the claim and payout occurred in 2021. They would not give me specifics or paperwork without consent from the attorney. What am I supposed to do if my attorney cannot be found, has closed my case without my knowledge and I cannot even speak about details on my own case? I never authorized or signed anything that would allow this case to close.

Please reach out to my new attorneys, Carey Leisure and Neal, who will now represent me. They will be able to provide further details and information on my case along with many others who have been victimized by Chris Reynolds. Due to his actions, he needs to be suspended, disbarred or jailed as he has hurt many people. I urge the Florida bar to reach out to his wife, or ex-wife who was a staff member to get an inside perspective of what was happening at this law firm.

**The Florida Bar
Inquiry/Complaint Form**

RECEIVED
NOV 14 2022
THE FLORIDA BAR - ACAP
TALLAHASSEE, FLORIDA

PART ONE (See Page 1, PART ONE – Complainant Information.):

Your Name: Dr. Reza Ghassemi
Organization: Reza Chiropractic
Address: 421 W. Stony St.
City, State, Zip Code: Bozeman, MT 59715
Phone: 727-434-1799
Email: reza@rezachiro.com
ACAP Reference No.: _____

Does this complaint pertain to a matter currently in litigation? Yes _____ No ✓

PART TWO (See Page 1, PART TWO – Attorney Information.):

Attorney's Name: Chris Reynolds Florida Bar No. 60589
Address: FL BAR: 11125 Park Blvd Ste 104-226 Seminole, FL 33772
City, State, Zip Code: Google address: 7178 Seminole Blvd, Seminole FL 33772
Phone: OFFICE: 727-777-7737 Cell: 727-249-8815

PART THREE (See Page 1, PART THREE – Facts/Allegations.): The specific thing or things I am complaining about are: (attach additional sheet).

PART FOUR (See Page 1, PART FOUR – Witnesses.): The witnesses in support of my allegations are: (attach additional sheet).

PART FIVE (See Page 1, PART FIVE – Acknowledge Oath and Signature.):



YOU MUST PLACE YOUR MARK IN THE BOX ACKNOWLEDGING THE
OATH AND YOU MUST SIGN YOUR FULL NAME BELOW.

Under penalties of perjury, I declare that the foregoing facts are true, correct and complete.

Dr. Reza Ghassemi
Print Name

[Signature]
Signature

11-9-22
Date

RE: Dr. Reza Ghassemi complaint against Attorney Chris Reynolds

I am a Florida licensed chiropractor and treated a patient represented by Chris Reynolds (Sarah Branyan). I received a settlement negotiation letter on January 14th, 2022. (EXHIBIT A) That letter states that the client would be willing to pay \$3021.58 as full and final settlement. I checked the box agreeing to accept that amount on January 19th, 2022. This document was signed by Attorney Reynolds and myself.

After not receiving a check and not hearing from Mr. Reynolds, I began leaving voicemails for Mr. Reynolds to determine what was happening. I received a voicemail on March 23rd, 2022. (EXHIBIT B) A printout of the voice to text states that "he did not know that things were not being done, client's contact information was deleted possibly, he wanted to talk to me because he wanted to close the case and the ball was dropped." After receiving that voicemail I also spoke with him personally that day inquiring the whereabouts of the settlement check. Attorney Reynolds agreed to issue the check and send to me within a couple of weeks.

EXHIBIT C is a copy of the letter I wrote to Attorney Reynolds on October 18th, 2022. This letter was sent via email, regular US mail, and I sent a text message asking him to please look at his email. This letter shows the times I reached out and my attempts were ignored. I am at a loss as there has been clearly an inability to communicate and responsibly handle a client's settlement. Furthermore, I am only seeking what was agreed upon in the settlement letter (EXHIBIT A)

It should be noted that my October 18th, 2022 letter incorrectly stated the amount owed. The settlement amount is \$3021.58 and I accidentally wrote \$3500 in the letter. Upon realizing this mistake, I texted Attorney Reynolds immediately to clarify the amount. I received absolutely no response to anything.

**The Florida Bar
Inquiry/Complaint Form**

STOP - PLEASE DOWNLOAD THIS FORM TO YOUR COMPUTER BEFORE FILLING IT OUT.

PART ONE (See Page 1, PART ONE – Complainant Information.):

Your Name: Jean Papa

Organization: _____

Address: 7449 124th St

City, State, Zip Code: Seminole, FL 33772

Phone: 352-427-8659

Email: jeannie1760@yahoo.com

ACAP Reference No.: _____

Does this complaint pertain to a matter currently in litigation? Yes X No _____

PART TWO (See Page 1, PART TWO – Attorney Information.):

Attorney's Name: Christopher Michael Reynolds Florida Bar No. 60589

Address: FL Bar shows: 11125 Park Blvd Ste 104-226, Last known: 7178 Seminole Blvd

City, State, Zip Code: Seminole, FL 33772 Seminole, FL 33772

Phone: Office (727) 777-7737, Cell (727) 249-8815 (disconnected)

PART THREE (See Page 1, PART THREE – Facts/Allegations.): The specific thing or things I am complaining about are: (attach additional sheet).

PART FOUR (See Page 1, PART FOUR – Witnesses.): The witnesses in support of my allegations are: (attach additional sheet).

PART FIVE (See Page 1, PART FIVE – Acknowledge Oath and Signature.):



YOU MUST PLACE YOUR MARK IN THE BOX ACKNOWLEDGING THE OATH AND
YOU MUST SIGN YOUR FULL NAME BELOW.

Under penalties of perjury, I declare that the foregoing facts are true, correct and complete.

Jean Anne Papa

Print Name

Signature

Date

*Having trouble? Download the form and open the document in Adobe Acrobat™.

THIS NEEDS URGENT ATTENTION

Facts/Allegations:

2/24/2022- I hired Christopher Reynolds for a personal auto injury case.

7/28/2022- via text I had with Chris Reynolds was that he sent everything to the insurance company (Shelter Mutual Insurance Co) and is waiting for a response for settlement.

9/13/2022- via message left by Chris Reynolds, gave me update still negotiating.

10/15/2022- never returned my text, call or email.

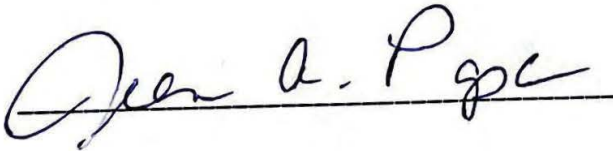
11/15/2022- I have been trying to contact Chris Reynolds via phone, text and email with no response. Found out today his office location at 7178 Seminole Blvd, Seminole FL 33772 has been vacant for 2 months per the Property Management company who he leased from. His cell phone has been disconnected; his web page has been removed.

11/15/2022- I spoke to Jasmine Lauer at Shelter Mutual Insurance Co 573-214-7018 and she said Chris Reynolds sent a demand for settlement of \$100k on July 5, 2022 and they sent \$100k settlement to Chris Reynolds on July 8, 2022. Jasmine said the check cleared and they were still waiting to receive a release signed by me which they never received. They have now turned it over to their litigation department. I never received any part of the settlement.

11/16/2022- I will be pursuing with Pinellas County Sheriff's Office 727-582-6200. I am waiting to hear back from Detective Kakalow who already has a case open from another victim & filed a complaint with the FL Bar last week with no response as of today. I found out through other blogs he has been settling cases for others without their knowledge where they have not received their settlement either (at least 12 victims). I am told he forged clients release letters.

Jean A. Papa

Date: 11/16/2022



Witness:

Rebecca A. Chiasson

Date: 11/16/2022



**The Florida Bar
Inquiry/Complaint Form**

**STOP - PLEASE DOWNLOAD THIS FORM TO YOUR COMPUTER BEFORE
FILLING IT OUT.**

PART ONE (See Page 1, PART ONE – Complainant Information.):

Your Name: Brenda Sands

Organization: Citibank

Address: 371 Audubon Oaks Or, Building 7 Apt 105

City, State, Zip Code: Lakeland, FL, 33809

Phone: 813-734-1752

Email: Brenda.Sands@hotmail.com

ACAP Reference No.: 23-4514

Does this complaint pertain to a matter currently in litigation? Yes No

PART TWO (See Page 1, PART TWO – Attorney Information.):

Attorney's Name: Chris Reynolds Florida Bar No. 60589

Address: 11125 Park Blvd Ste 104-226

City, State, Zip Code: Seminole, FL 33772-4700

Phone: 727-777-7737

PART THREE (See Page 1, PART THREE – Facts/Allegations.): The specific thing or things I am complaining about are: (attach additional sheet).

PART FOUR (See Page 1, PART FOUR – Witnesses.): The witnesses in support of my allegations are: (attach additional sheet).

PART FIVE (See Page 1, PART FIVE – Acknowledge Oath and Signature.):

☒ YOU MUST PLACE YOUR MARK IN THE BOX ACKNOWLEDGING THE OATH AND
YOU MUST SIGN YOUR FULL NAME BELOW.

Under penalties of perjury, I declare that the foregoing facts are (true, correct and complete.

Brenda Sands

Print Name

Brenda Sands

Signature

11/04/2022

Date

*Having trouble? Download the form and open the document in Adobe Acrobat™.

The attorney has failed to contact me within a reasonable time frame. I have attempted to call his cell phone, office phone, emails and Facebook messages but have not heard back. The office phone continually rings and does not allow someone to leave a voicemail. I went and visited his office, but the door is locked, and the office appears to be vacant. The business owners next door was asked if they had seen him and the only thing that was said was that he has not been around and that many people were looking for him.

I was under the assumption the case was still open when I came across Facebook posts stating that he is a criminal, and cases were being closed without advising clients. Several people had similar issues and it had all happened recently. I got in contact with a couple individuals who shared their story and was baffled that this was happening. I called my insurance company but have not been able to get in contact with any claim adjustor that knows about my case, but the mobile app says the claim had closed months prior. I did not sign or authorize the closure of my claim with progressive. I called USAA, the at fault drivers' insurance company, and the representative advised that the claim and payout occurred in 2021. They would not give me specifics or paperwork without consent from the attorney. What am I supposed to do if my attorney cannot be found, has closed my case without my knowledge and I cannot even speak about details on my own case? I never authorized or signed anything that would allow this case to close.

Please reach out to my new attorneys, Carey Leisure and Neal, who will now represent me. They will be able to provide further details and information on my case along with many others who have been victimized by Chris Reynolds. Due to his actions, he needs to be suspended, disbarred or jailed as he has hurt many people. I urge the Florida bar to reach out to his wife, or ex-wife who was a staff member to get an inside perspective of what was happening at this law firm.

**The Florida Bar
Inquiry/Complaint Form**

PART ONE (See Page 1, PART ONE – Complainant Information.):

Your Name: Rebecca Null

Organization: _____

Address: 5601 43rd Street North

City, State, Zip Code: Saint Petersburg, Florida 33714

Phone: (727) 502-7999

Email: reerunyon9@gmail.com

ACAP Reference No.: _____

Does this complaint pertain to a matter currently in litigation? Yes _____ No X

PART TWO (See Page 1, PART TWO – Attorney Information.):

Attorney's Name: Christopher Reynolds Florida Bar No. 60589

Address: 11125 Park Blvd. Ste 104-226

City, State, Zip Code: Seminole, Florida 33772

Phone: (727) 777-7737 [office] ; (727) 249-8815 [cell]

PART THREE (See Page 1, PART THREE – Facts/Allegations.): The specific thing or things I am complaining about are: (attach additional sheet). non-communication;

non-disbursement of settlement funds; non-payment of providers
PART FOUR (See Page 1, PART FOUR – Witnesses.): The witnesses in support of my allegations are: (attach additional sheet).

James C. Runyon - (727) 687-6181; 4053 12th Avenue North, Saint Petersburg, FL 33713



YOU MUST PLACE YOUR MARK IN THE BOX ACKNOWLEDGING THE OATH AND YOU MUST SIGN YOUR FULL NAME BELOW.

Under penalties of perjury, I declare that the foregoing facts are true, correct and complete.

Rebecca Null

Print Name

Signature

Date

11-23-2022

Rebecca Null
5601 43rd St. N
St. Petersburg, FL, 33714

September 9, 2022

To: Attorney Chris Reynolds

With consultation with my father, I accepted the offer put forth by Geico. This occurred on October 21, 2021 and was confirmed by email to you on October 21, 2021. I cannot list all my attempts to obtain a resolution date.

Finally on May 12, 2022 you provided a closing statement that omitted a provider. You were working to remedy the issue but nothing as of yet.

I requested a partial payment on July 6th, 2022 and you complied. I have had no contact with you or your office after July 6th, 2022, despite many attempts to call and leave messages for you and your staff with requests to receive a call back. Since August 18th, 2022, I have attempted to call 16 times with no response.

Sufficient time has passed, and this matter must be brought to an end. I am establishing a three-week time limit to have the closing statement and funds in my possession. Deadline date September 15th, 2022.

If I do not receive contact prior to end of business day three days after receipt of this letter, I will be calling the Attorney Consumer Assistance Program for assistance in reaching you before escalating this matter further.

Thank you,

A handwritten signature in black ink, appearing to read 'Rebecca Null', written in a cursive style.

Rebecca Null