

IN THE SUPREME COURT OF FLORIDA

THE FLORIDA BAR,
Complainant,

Supreme Court Case
No. SC-

v.

The Florida Bar File
No. 2022-00,088(4B)

HEATHER BROOKE QUICK,
Respondent.

_____ /

CONDITIONAL GUILTY PLEA FOR CONSENT JUDGMENT

COMES NOW, the undersigned respondent, Heather Brooke Quick, and files this Conditional Guilty Plea pursuant to Rule 3-7.9 of the Rules Regulating The Florida Bar.

1. Respondent is, and at all times mentioned herein was, a member of The Florida Bar, subject to the jurisdiction of the Supreme Court of Florida.
2. Respondent is currently the subject of a Florida Bar disciplinary matter which has been assigned The Florida Bar File No. 2022-00,088(4B).
3. On May 25, 2022, the Fourth Judicial Grievance Committee "B" found probable cause in this matter.

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4. Respondent is acting freely and voluntarily in this matter and tenders this Plea without fear or threat of coercion. Respondent is represented in this matter.

5. The disciplinary measures to be imposed upon respondent are as follows:

A. Public Reprimand by publication;

B. Attendance at Ethics School within 6 months of the Court's final order any payment of the \$750.00 workshop fee; and,

C. Payment of The Florida Bar's costs.

6. The following allegations and rules provide the basis for respondent's guilty plea and for the discipline to be imposed in this matter:

A. Respondent is the owner/managing partner of Florida's Woman's Law Group (respondent's firm) in Jacksonville, Florida.

B. On July 28, 2020, Veronica Duhovis (Ms. Duhovis) retained respondent's firm to represent her in her divorce and signed a retainer agreement.

C. Andrea Lehner (Ms. Lehner), an associate of respondent's, was assigned to Ms. Duhovis' case.

D. All aspects of Ms. Duhovis' case were handled by Ms. Lehner.

E. A hearing on the husband's motion to dismiss for lack of jurisdiction was held on November 6, 2020. By order dated December 14, 2020, the judge granted the motion.

F. On or around December 2020, Ms. Lehner resigned her employment with respondent's firm and worked her last day with the firm on December 18, 2020.

G. On December 30, 2020, Ms. Duhovis terminated Ms. Lehner's services via email and demanded a return of the funds she paid in attorney fees. Respondent was included on the email.

H. On January 11, 2021, Ms. Duhovis had a telephone conference to discuss the matter with respondent. During that conversation, respondent offered further services from her firm, but Ms. Duhovis declined, stating that that she did not wish to pursue any further action in Jacksonville, Florida.

I. Respondent had no prior contact with Ms. Duhovis until this conversation.

J. Ms. Duhovis alleges that neither Ms. Lehner nor respondent informed her that following the adverse ruling by the court, that she had the right to appeal the court's decision within a 30-

day time frame. She also alleges she was not notified Andrea Lehner had left the firm in mid-December 2020.

K. A remaining balance of \$2,740.71, was maintained in trust and due to Ms. Duhovis after respondent's firm had been terminated.

L. On February 19, 2021, Ms. Duhovis sent respondent a certified letter expressing her dissatisfaction and demanded a full refund of all funds paid in the amount of \$13,800.00.

M. Ms. Duhovis did not receive any response to her letter from respondent's firm.

N. On September 16, 2021, respondent by check, returned Ms. Duhovis' trust balance of \$2,740.71.

O. Respondent explained the delay in returning the funds was "due to a breakdown in the firm's policies and procedures. The primary attorney generally initiates the closing procedure, and a checklist is followed. We recognize that our procedure relied too heavily on one individual and additionally does not focus on cases with little activity. When Ms. Duhovis's case became less active, there was not an automated reminder to reach out to her and/or return her trust account funds."

P. The Florida Bar's auditor reviewed respondent's trust account and believed the delay in returning Ms. Duhovis' funds was an unintentional error.

Q. In response to The Florida Bar's investigation, respondent was ambiguous in her response about what information Ms. Duhovis had been given about her right to appeal, affecting the proper administration of justice in these proceedings.

R. By reason of the foregoing, respondent has violated the following Rules Regulating The Florida Bar: 4-1.3 Diligence; Rule 4-1.15 Compliance with Trust Accounting Rules; Safekeeping Property; 4-1.16(d) Protection of Client's Interest; 4-5.1(a) Duties Concerning Adherence to Rules of Professional Conduct; 4-5.1(b) Supervisory Lawyer's Duties; 4-5.1(c) Responsibility for Rules Violations; 5-1.1(e) Notice of Receipt of Trust Funds; Delivery; Accounting.

7. Subsequent to the grievance committee's investigation, discovery has revealed evidence in support of Florida Bar Rule 4-8.4(d), rather than 4-8.1. Therefore, this consent agreement adopts Florida Bar Rule 4-8.4(d) and dismisses Florida Bar Rule 4-8.1.

8. Aggravating Factors

[3.2(b)(9)] Substantial experience in the practice of law. Respondent has been a licensed attorney in the state of Florida since April 16, 2001.

9. Mitigating Factors

[3.3(b)(1)] absence of a prior discipline record.

[3.3(b)(2)] absence of a dishonest or selfish motive.

[3.3(b)(7)] character and reputation. Respondent has a reputation of a reputable law firm.

[3.3(b)(12)] Remorse. Respondent has expressed remorse for her conduct.

10. The Florida Bar has approved this proposed plea in the manner required by Rule 3-7.9.

11. If this plea is not finally approved by the Board of Governors of The Florida Bar and the Supreme Court of Florida, then it shall be of no effect and may not be used by the parties in any way.

12. If this plea is approved, then respondent agrees to pay all reasonable costs associated with this case pursuant to Rule 3-7.6(q) in the amount of \$1,330.00. These costs are due within 30 days of the court order. Respondent agrees that if the costs are not paid within 30 days of

this court's order becoming final, respondent shall pay interest on any unpaid costs at the statutory rate. Respondent further agrees not to attempt to discharge the obligation for payment of the bar's costs in any future proceedings, including but not limited to, a petition for bankruptcy. Respondent shall be deemed delinquent and ineligible to practice law pursuant to Rule 1-3.6 if the cost judgment is not satisfied within 30 days of the final court order, unless deferred by the Board of Governors of The Florida Bar.

13. Respondent acknowledges the obligation to pay the costs of this proceeding and that payment is evidence of strict compliance with the conditions of any disciplinary order or agreement and is also evidence of good faith and fiscal responsibility. Respondent understands that failure to pay the costs of this proceeding will reflect adversely on any other bar disciplinary matter in which respondent is involved.

14. This Conditional Guilty Plea for Consent Judgment fully complies with all requirements of the Rules Regulating The Florida Bar.

Dated this 28 day of September, 2022.



[Heather Quick \(Sep 28, 2022 19:25 EDT\)](#)

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Dated this 28th day of September, 2022.



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Dated this 3rd day of October, 2022.



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