

STATE OF FLORIDA  
COUNTY OF ORANGE

**AFFIDAVIT**

I, Matthew D. Herdeker, after being duly sworn, say:

1. I have been an auditor with The Florida Bar, located at 1000 Legion Place, Suite 1625, Orlando, Florida 32801, since 2012. My duties include conducting compliance audits of lawyers' trust accounts, investigating allegations of misappropriation from trust accounts, preparing written reports of audit findings, and providing testimony regarding my findings. I have provided testimony as an expert witness in trust accounting matters in bar disciplinary proceedings. I am a Certified Public Accountant (CPA) and Certified Fraud Examiner (CFE).

2. I conducted a compliance audit of respondent's trust account for the period December 1, 2019 through June 30, 2024, after Bank of America notified the bar that there was an overdraft of \$2,402.57 in the account on March 26, 2024.

3. On April 9, 2024, the bar sent a letter to respondent, asking her to explain the circumstances of the overdraft and provide supporting documentation.

4. In her response on April 24, 2024, respondent explained that the overdraft occurred because she sent a trust check to a client but was delayed in making a deposit into her trust account.

5. On April 25, 2024, the bar initiated a compliance audit and sent a letter to respondent, asking her to provide various trust account records for the period November 1, 2023 through April 30, 2024.

6. On May 9, 2024, respondent provided records to the bar which revealed a shortage of \$2,500.00 in the trust account in March 2024.

7. Respondent caused the shortage by disbursing her fees of \$2,500.00 for the "M.P." settlement on March 13, 2024, two weeks before she deposited the settlement check for the matter into her trust account.

8. Respondent, therefore, used funds owed to another client ("M.R.S.") to pay herself the \$2,500.00.

9. On May 21, 2024, the bar sent a letter to respondent asking her to provide trust account records for an expanded audit period going back to April 1, 2021.

10. Respondent provided various records on June 24, 2024, June 25, 2024, and June 26, 2024. In a letter she included with one of the responses, she admitted that she used clients' settlement funds, intended

to pay medical providers, for her living expenses. A copy of the letter is included as **Attachment 1**.

11. On July 2, 2024, the bar served a subpoena, signed by the Chair of the 7B Grievance Committee, to Bank of America for respondent's trust account bank records for the period January 1, 2018 to present. Bank of America provided the records on August 13, 2024.

12. Based on my review of the records Bank of America and respondent provided, I identified a shortage ranging from \$3,333.33 to \$37,052.50 in the trust account from December 2020 to June 2024. I prepared a chart illustrating the shortage by month, included as **Attachment 2**.

13. For example, on June 30, 2024 (the last day of the audit period), respondent should have held balances totaling \$37,059.93 for six clients in the trust account. The balances appeared to be owed to clients or their medical providers from insurance settlements. The bank balance in the trust account, however, was only \$7.43, resulting in a shortage of \$37,052.50.

14. Respondent caused the shortage by issuing 11 checks to herself and one transfer totaling \$37,890.00. The checks were in large, even dollar amounts. The memo lines of the checks were blank, and

respondent's journal entries described the checks as "personal." Copies of the checks are included as **Attachment 3**.

15. Of the total amount of \$37,890.00, I identified only \$837.50 belonging to respondent as her costs from a settlement.

16. In letters dated April 25, 2024, May 21, 2024, and August 14, 2024, the bar asked respondent to provide trust account records, to include a receipts and disbursements journal, client ledgers, monthly reconciliations, monthly comparisons, and closing statements.

17. Respondent was required to maintain those records pursuant to Chapters 4 and 5 of The Rules Regulating The Florida Bar.

18. Respondent did not provide closing statements for four settlements she received from December 2019 to January 2021.

19. Costs, if any, owed to respondent from those settlements would reduce the shortage, but likely not by a significant amount. The costs reflected in other closing statements respondent provided ranged from \$0.00 to \$837.50.

20. Respondent provided two journals, neither of which was compliant with the trust accounting rules.

21. She did not provide any client ledgers, monthly reconciliations, or monthly comparisons.

22. In a letter to the bar dated June 24, 2024, respondent wrote, "I did not include the Monthly reconciliations and Monthly comparisons. Unfortunately, I was not compliant in following Rule 5-1.2(b)(6) as it pertains to the monthly reconciliations and comparisons. I thought it would be disingenuous to create them solely for the purpose of appearing compliant."


23. Respondent certified that she was in compliance with the trust account and property safekeeping rules when she paid her membership dues in 2021, 2022, and 2023.

### **Opinions**

24. It is my professional opinion that respondent was not in substantial compliance with the bar's rules governing trust accounts.

25. It is also my professional opinion that respondent misappropriated client funds and used them for her own benefit.

FURTHER AFFIANT SAYETH NOT.



MATTHEW D. HERDEKER

SWORN TO AND SUBSCRIBED before me this 5<sup>th</sup> day of September, 2024.

Terra Eads

Notary Public



TERRA EADS  
Commission # HM 565324  
Expires August 13, 2028

Print, type, or stamp commission  
name of notary public

✓ Personally known to me  
Produced the following identification  
Type of Identification produced: \_\_\_\_\_

June 25, 2024

The Florida Bar  
Orlando Branch Office  
The Gateway Center  
1000 Legion Place, Ste 125  
Orlando, Florida 32801-1050

**Re: The Florida Bar File No. 2024-30,615 (7B)**

To The Florida Bar,

Within a short period, I have gained a clearer understanding of the necessity for meticulous adherence to the rules governing trust account operations. I recognize that only the details of my Iota Trust account have been requested, not an explanation. However, the gravity of this situation is not lost on me. It is my intention to move through this process in a manner that reflects accountability, integrity, and growth. To that end, I believe it is appropriate to provide actual context to a process that can impact my future.

In explaining the circumstances that led to the current audit, I hope the committee will consider the unique challenges and circumstances that prevailed during the period in question. This explanation is not intended as an excuse for noncompliance, but rather as a realistic backdrop that influenced my decision-making process.

A year prior to the onset of the pandemic, I relocated to Orlando, Florida, on the evening of my mother's funeral. Two days later, I transitioned from full time parental caregiver to a full-time position as a High School Educator. I believed teaching was a prudent option during a period of personal grief and relocation. My original intention was to gradually reintegrate myself into the practice of law. I began drafting demand letters for fellow attorneys via social media, and eventually took on two (2) significant accident cases against Walmart and Lyft, among a few other smaller cases. Then there was Covid.

The pandemic shut schools down in March of 2020. In two months, I was without a steady income and in an exceptionally precarious situation. Despite my best consistent efforts on my cases,

and despite the substantial resources I personally invested in the Walmart & Lyft cases, the closure of courts and the insurance companies' exploitation of the pandemic's chaos, prevented the settlement of my two promising best cases. My finances were depleted, and I was compelled to refer those 2 big cases to large litigation firms.

When the smaller cases settled, I paid my clients and received my attorney fees. However, as my ledger reflects, I did not immediately compensate the medical providers. In September 2021, 18 months after the pandemic-induced shutdown, I resorted to utilizing the medical providers' funds to pay for the cost of living. The alternative would have rendered my son and me homeless.

When I initially received the bar inquiry, I experienced a personal paralysis. There was not only a financial reconciling that was required of me, but also an emotional reconciling that was past due. My need to confront the grief, stress, changes, and isolation that commenced with my mother's passing and culminated in my current virtual solo-law practice, was inevitable.

As such, I have sought and found the following valuable resources that have been incredibly beneficial in supporting lawyers in similar predicaments.

1. CLE Course: "Harnessing the Power of Stress: Developing a Grit and Growth Mindset" by Marcia Weldon. It was exceptionally with many insights that can lead to healing. Emotional Resilience was a concept that was particularly striking.
2. FLH: I contacted the Florida Law Clinical Intake Coordinator, Jerry Wooldridge, and was referred to Everyone's Counseling Center, Inc or Image and Likeness Counseling/Mirella Caro-Cortes for 5 free counseling sessions. I have called both and am awaiting the first available spot.
3. Podcast: Managing Client Trust Accounts and Ensuring Compliance Course (#8042) by Paul Garibian was informative.
4. The Florida Bar Legal Fuel Podcast Trust account compliance & How Nola can Help. I am now an active Nola participant.
5. I have begun to make payment arrangements with any and all parties owed.

As an attorney with a 30-year career, devoid of bar violations or complaints, I remain steadfast in my commitment to uphold the rules regulating the legal profession. I am open to any appropriate guidance. I view this process as an invaluable learning experience that fortifies my practice.

Yours sincerely,  
*Natalie Everett Jones*  
Attorney Natalie Jones



**Natalie Jones - Orlando, FL**  
**File No. 2024-30,615 (7B)**  
**Audit Period: 12/1/2019 to 6/30/2024**  
**Chart of Monthly Shortage**

(A) Date	Required Balances								(J) Total (B→I)	(K) Bank Balance	(L) (Shortage) (K minus J)
	(B) Client I.V.*	(C) Client J.T.*	(D) Client B.R.*	(E) Client M.G.*	(F) Client E.W.	(G) Client I.P.M.	(H) Client B.M.	(I) Client M.R.S.			
12/31/19	\$66,666.67								\$66,666.67	\$66,666.67	\$0.00
01/31/20	\$17,512.17								\$17,512.17	\$17,512.17	\$0.00
02/29/20	\$17,512.17								\$17,512.17	\$17,512.17	\$0.00
03/31/20	\$17,512.17	\$6,666.67							\$24,178.84	\$24,178.84	\$0.00
04/30/20	\$17,512.17	\$476.00							\$17,988.17	\$17,988.17	\$0.00
05/31/20	\$17,512.17	\$476.00							\$17,988.17	\$17,988.17	\$0.00
06/30/20	\$17,512.17	\$476.00							\$17,988.17	\$17,988.17	\$0.00
07/31/20	\$17,512.17	\$476.00							\$17,988.17	\$17,988.17	\$0.00
08/31/20	\$17,512.17	\$476.00							\$17,988.17	\$17,988.17	\$0.00
09/30/20	\$17,512.17	\$476.00	\$1,800.00						\$19,788.17	\$19,788.17	\$0.00
10/31/20	\$17,512.17	\$476.00	\$1,800.00						\$19,788.17	\$19,788.17	\$0.00
11/30/20	\$17,512.17	\$476.00	\$1,800.00						\$19,788.17	\$19,788.17	\$0.00
12/31/20	\$17,512.17	\$476.00	\$1,800.00						\$19,788.17	\$16,454.84	(\$3,333.33)
01/31/21	\$17,512.17	\$476.00	\$1,800.00	\$2,771.76					\$22,559.93	\$22,559.93	\$0.00
02/28/21	\$17,512.17	\$476.00	\$1,800.00	\$2,771.76					\$22,559.93	\$15,559.93	(\$7,000.00)
03/31/21	\$17,512.17	\$476.00	\$1,800.00	\$2,771.76					\$22,559.93	\$15,559.93	(\$7,000.00)
04/30/21	\$17,512.17	\$476.00	\$1,800.00	\$2,771.76					\$22,559.93	\$15,559.93	(\$7,000.00)
05/31/21	\$17,512.17	\$476.00	\$1,800.00	\$2,771.76					\$22,559.93	\$15,559.93	(\$7,000.00)
06/30/21	\$17,512.17	\$476.00	\$1,800.00	\$2,771.76					\$22,559.93	\$15,559.93	(\$7,000.00)
07/31/21	\$17,512.17	\$476.00	\$1,800.00	\$2,771.76					\$22,559.93	\$15,559.93	(\$7,000.00)
08/31/21	\$17,512.17	\$476.00	\$1,800.00	\$2,771.76					\$22,559.93	\$15,559.93	(\$7,000.00)
09/30/21	\$17,512.17	\$476.00	\$1,800.00	\$2,771.76					\$22,559.93	\$9,559.93	(\$13,000.00)
10/31/21	\$17,512.17	\$476.00	\$1,800.00	\$2,771.76					\$22,559.93	\$3,559.93	(\$19,000.00)
11/30/21	\$17,512.17	\$476.00	\$1,800.00	\$2,771.76					\$22,559.93	\$1,059.93	(\$21,500.00)
12/31/21	\$17,512.17	\$476.00	\$1,800.00	\$2,771.76					\$22,559.93	\$1,059.93	(\$21,500.00)
01/31/22	\$17,512.17	\$476.00	\$1,800.00	\$2,771.76					\$22,559.93	\$1,059.93	(\$21,500.00)
02/28/22	\$17,512.17	\$476.00	\$1,800.00	\$2,771.76					\$22,559.93	\$1,059.93	(\$21,500.00)
03/31/22	\$17,512.17	\$476.00	\$1,800.00	\$2,771.76					\$22,559.93	\$1,059.93	(\$21,500.00)
04/30/22	\$17,512.17	\$476.00	\$1,800.00	\$2,771.76	\$88,772.31				\$111,332.24	\$101,927.54	(\$9,404.70)



(A) Date	Required Balances								(J) Total (B→I)	(K) Bank Balance	(L) (Shortage) (K minus J)
	(B) Client I.V.*	(C) Client J.T.*	(D) Client B.R.*	(E) Client M.G.*	(F) Client E.W.	(G) Client I.P.M.	(H) Client B.M.	(I) Client M.R.S.			
05/31/22	\$17,512.17	\$476.00	\$1,800.00	\$2,771.76		\$4,500.00			\$27,059.93	\$6,397.43	(\$20,662.50)
06/30/22	\$17,512.17	\$476.00	\$1,800.00	\$2,771.76		\$4,500.00			\$27,059.93	\$6,397.43	(\$20,662.50)
07/31/22	\$17,512.17	\$476.00	\$1,800.00	\$2,771.76		\$4,500.00			\$27,059.93	\$1,397.43	(\$25,662.50)
08/31/22	\$17,512.17	\$476.00	\$1,800.00	\$2,771.76		\$4,500.00	\$20,800.00		\$47,859.93	\$21,397.43	(\$26,462.50)
09/30/22	\$17,512.17	\$476.00	\$1,800.00	\$2,771.76		\$4,500.00	\$10,000.00		\$37,059.93	\$597.43	(\$36,462.50)
10/31/22	\$17,512.17	\$476.00	\$1,800.00	\$2,771.76		\$4,500.00	\$10,000.00		\$37,059.93	\$597.43	(\$36,462.50)
11/30/22	\$17,512.17	\$476.00	\$1,800.00	\$2,771.76		\$4,500.00	\$10,000.00		\$37,059.93	\$597.43	(\$36,462.50)
12/31/22	\$17,512.17	\$476.00	\$1,800.00	\$2,771.76		\$4,500.00	\$10,000.00		\$37,059.93	\$597.43	(\$36,462.50)
01/31/23	\$17,512.17	\$476.00	\$1,800.00	\$2,771.76		\$4,500.00	\$10,000.00		\$37,059.93	\$97.43	(\$36,962.50)
02/28/23	\$17,512.17	\$476.00	\$1,800.00	\$2,771.76		\$4,500.00	\$10,000.00		\$37,059.93	\$97.43	(\$36,962.50)
03/31/23	\$17,512.17	\$476.00	\$1,800.00	\$2,771.76		\$4,500.00	\$10,000.00		\$37,059.93	\$97.43	(\$36,962.50)
04/30/23	\$17,512.17	\$476.00	\$1,800.00	\$2,771.76		\$4,500.00	\$10,000.00		\$37,059.93	\$97.43	(\$36,962.50)
05/31/23	\$17,512.17	\$476.00	\$1,800.00	\$2,771.76		\$4,500.00	\$10,000.00		\$37,059.93	\$97.43	(\$36,962.50)
06/30/23	\$17,512.17	\$476.00	\$1,800.00	\$2,771.76		\$4,500.00	\$10,000.00		\$37,059.93	\$97.43	(\$36,962.50)
07/31/23	\$17,512.17	\$476.00	\$1,800.00	\$2,771.76		\$4,500.00	\$10,000.00		\$37,059.93	\$97.43	(\$36,962.50)
08/31/23	\$17,512.17	\$476.00	\$1,800.00	\$2,771.76		\$4,500.00	\$10,000.00		\$37,059.93	\$97.43	(\$36,962.50)
09/30/23	\$17,512.17	\$476.00	\$1,800.00	\$2,771.76		\$4,500.00	\$10,000.00		\$37,059.93	\$97.43	(\$36,962.50)
10/31/23	\$17,512.17	\$476.00	\$1,800.00	\$2,771.76		\$4,500.00	\$10,000.00		\$37,059.93	\$97.43	(\$36,962.50)
11/30/23	\$17,512.17	\$476.00	\$1,800.00	\$2,771.76		\$4,500.00	\$10,000.00		\$37,059.93	\$97.43	(\$36,962.50)
12/31/23	\$17,512.17	\$476.00	\$1,800.00	\$2,771.76		\$4,500.00	\$10,000.00		\$37,059.93	\$97.43	(\$36,962.50)
01/31/24	\$17,512.17	\$476.00	\$1,800.00	\$2,771.76		\$4,500.00	\$10,000.00		\$37,059.93	\$97.43	(\$36,962.50)
02/29/24	\$17,512.17	\$476.00	\$1,800.00	\$2,771.76		\$4,500.00	\$10,000.00	\$6,062.06	\$43,121.99	\$10,097.43	(\$33,024.56)
03/31/24	\$17,512.17	\$476.00	\$1,800.00	\$2,771.76		\$4,500.00	\$10,000.00	\$6,062.06	\$43,121.99	\$11,159.79	(\$31,962.20)
04/30/24	\$17,512.17	\$476.00	\$1,800.00	\$2,771.76		\$4,500.00	\$10,000.00		\$37,059.93	\$97.43	(\$36,962.50)
05/31/24	\$17,512.17	\$476.00	\$1,800.00	\$2,771.76		\$4,500.00	\$10,000.00		\$37,059.93	\$97.43	(\$36,962.50)
06/30/24	\$17,512.17	\$476.00	\$1,800.00	\$2,771.76		\$4,500.00	\$10,000.00		\$37,059.93	\$7.43	(\$37,052.50)

\*On August 14, 2024, the bar asked Ms. Jones for closing statements for the I.V., J.T., B.R., and M.G. settlements, with a due date of August 26, 2024. Respondent has not provided the records. Any costs owed to Ms. Jones in the settlements could reduce the amount of the shortage, but are likely not significant.

**FLORIDA IOTA TRUST ACCOUNTS  
ATTORNEY NATALIE JONES, INC.**

9907 8TH STRET  
UNIT 812  
GOTHA, FL 34734

1009

63-4/630 FL  
15280

DATE Feb. 2, 2021

PAY  
TO THE  
ORDER OF

Natalie Jones

\$7,000.00

Seven Thousand

xx  
100

DOLLARS



Photo  
Safe  
Deposit  
Details on back

**BANK OF AMERICA**



ACH R/T 063100277

Natalie Jones

FOR

⑈001009⑈ ⑈063000047⑈

⑈667⑈

ATTACHMENT 3

**FLORIDA IOTA TRUST ACCOUNTS  
ATTORNEY NATALIE JONES, INC.**

8907 8TH STRET  
UNIT 812  
GOTHA, FL 34734

1014

63-4530 FL  
15280

DATE Sept. 29, 2021

PAY  
TO THE  
ORDER OF

Attorney Natalie Jones  
Six Thousand

\$6,000

~~100~~  
DOLLARS

**BANK OF AMERICA** 

ACH R/T 063100277

FOR \_\_\_\_\_



⑈001014⑈ ⑆063000047⑆

1667⑈



Photo  
Safe  
Deposit®  
Details on back

**FLORIDA IOTA TRUST ACCOUNTS  
ATTORNEY NATALIE JONES, INC.**

9907 8TH STRET  
UNIT 812  
GOTHA, FL 34734

1016

63-4/630 FL  
15280

DATE Oct 18. 2021

PAY  
TO THE  
ORDER OF

Attorney Natalie Jones \$6,000.00  
Six Thousand xx  
00 DOLLARS

**BANK OF AMERICA** 

ACH R/T 063100277



Photo  
Safe  
Deposit®  
Details on back

*Natalie Jones*

FOR \_\_\_\_\_

⑈001016⑈ ⑈063000047⑈

1667⑈

FLORIDA IOTA TRUST ACCOUNTS  
ATTORNEY NATALIE JONES, INC.

9907 8TH STREET  
UNIT 812  
GOTHA, FL 34734

1017

63-4/830 FL  
15280

DATE Nov. 9, 2021

PAY  
TO THE  
ORDER OF

Natalie Everett Jones

\$1,000.00

One Thousand Dollars

DOLLARS



Phantom  
Safe  
Deposit  
Check on top

BANK OF AMERICA

ACH INT 003100277

FOR

Natalie Jones

⑈001017⑈ ⑆063000047⑆

6667⑈

**FLORIDA IOTA TRUST ACCOUNTS  
ATTORNEY NATALIE JONES, INC.**

9907 8TH STRET  
UNIT 812  
GOTHA, FL 34734

1018

63-4/630 FL  
15280

DATE Nov, 12, 2021

PAY  
TO THE  
ORDER OF

Natalie Jones

\$ 500.00

Five Hundred

100 DOLLARS

**BANK OF AMERICA**



ACH R/T 063100277



Photo  
Safe  
Deposit  
Details on back

FOR

Natalie Jones

⑈001018⑈ ⑈063000047⑈

1667⑈



**FLORIDA IOTA TRUST ACCOUNTS  
ATTORNEY NATALIE JONES, INC.**

9807 8TH STRET  
UNIT 812  
GOTHA, FL 34734

1019

63-4630 FL  
15280

DATE Nov. 23, 2021

PAY  
TO THE  
ORDER OF

Natalie Jones \$1,000.00  
One Thousand <sup>00</sup>/<sub>100</sub> DOLLARS

**BANK OF AMERICA** 

ACH R/T 053100277

Photo  
Safe  
Deposit  
Details on back

FOR \_\_\_\_\_

Natalie R Jones

⑈001019⑈ ⑆063000047⑆

1667⑈



FLORIDA IOTA TRUST ACCOUNTS  
ATTORNEY NATALIE JONES, INC.

9907 8TH STREET  
UNIT 812  
GOTHA, FL 34734

1024

83-4/830 FL  
15280

DATE July 2, 2022

PAY  
TO THE  
ORDER OF

Natalie Jones

\$2,000.00

Two Thousand

DOLLARS

BANK OF AMERICA

ACH R/T 003100277

FOR

*[Signature]*

⑈001024⑈ ⑆063000047⑆

1667⑈

**FLORIDA IOTA TRUST ACCOUNTS  
ATTORNEY NATALIE JONES, INC.**

8907 8TH STRET  
UNIT 812  
GOTHA, FL 34734

1025

63-4/630 FL  
15280

DATE July 18, 2022

PAY  
TO THE  
ORDER OF

Natalie Everett Jones

\$3,000.00

Three Thousand

00 DOLLARS

**BANK OF AMERICA**

ACH RVT 063100277



Micro  
Safe  
Deposit®  
Details on back

[Signature]

FOR \_\_\_\_\_

⑈001025⑈ ⑈063000047⑈

⑈667⑈

**FLORIDA IOTA TRUST ACCOUNTS  
ATTORNEY NATALIE JONES, INC.**

9907 8TH STRET  
UNIT 812  
GOTHA, FL 34734

1026

63-4630 FL  
15280

DATE Aug. 3, 2022

PAY  
TO THE  
ORDER OF

Attorney Natalie Jones \$ 900.00  
Nine Hundred xx  
100 DOLLARS

**BANK OF AMERICA** 

ACH R/T 003100277

Photo  
Safe  
Deposit  
Cash on back

FOR \_\_\_\_\_

Natalie Jones

⑈001026⑈ ⑆063000047⑆

1667⑈

**FLORIDA IOTA TRUST ACCOUNTS  
ATTORNEY NATALIE JONES, INC.**

9907 8TH STRET  
UNIT 812  
GOTHA, FL 34734

1030

63-4/630 FL  
15280

DATE Sept. 21, 2022

PAY  
TO THE  
ORDER OF

Attorney Natalie Jones \$10,000.00  
Ten Thousand <sup>xx</sup>/<sub>00</sub> DOLLARS

**BANK OF AMERICA**

ACH R/T 063100277

FOR

Natalie Jones

⑈001030⑈ ⑆063000047⑆

1667⑈

Photo  
Safe  
Deposit®  
Details on back

**FLORIDA IOTA TRUST ACCOUNTS  
ATTORNEY NATALIE JONES, INC.**

9907 8TH STRET  
UNIT 812  
GOTHA, FL 34734

1038

63-4/630 FL  
15280

DATE June 17, 2024

PAY  
TO THE  
ORDER OF

Natalie Jones

\$90.00

Ninety

100 DOLLARS

**BANK OF AMERICA**



ACH R/T 063100277

FOR \_\_\_\_\_

Natalie Jones



Photo  
Safe  
Deposit®  
Drawn on back

⑈001038⑈ ⑈063000047⑈

1667⑈